

BEFORE THE DIRECTOR  
OF THE DEPARTMENT OF CONSUMER AFFAIRS  
PROFESSIONAL FIDUCIARIES BUREAU  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

CHRISTINE M. BACKHOUSE  
[REDACTED]  
[REDACTED] 8

Professional Fiduciary License No. PF 263

Respondent.

Case Nos. PF-2011-60, PF-2011-62,  
PF-2011-66, PF-2011-67, and  
PF-2011-82

**DECISION AND ORDER**

The attached Stipulated Surrender and Disciplinary Order is hereby adopted as the Decision of the Director of Consumer Affairs in the above-entitled matter.

This Decision shall become effective on DECEMBER 31, 2014  
IT IS SO ORDERED December 5, 2014.

[REDACTED]  
\_\_\_\_\_  
TAMARA COLSON  
Assistant General Counsel  
Division of Legal Affairs  
Department of Consumer Affairs

1 KAMALA D. HARRIS  
2 Attorney General of California  
3 DIANN SOKOLOFF  
4 Supervising Deputy Attorney General  
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14 *Attorneys for Complainant*

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**BEFORE THE  
PROFESSIONAL FIDUCIARIES BUREAU  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

CHRISTINE M. BACKHOUSE  
P.O. Box 5280  
San Jose, CA 95150-5280

Professional Fiduciary License No. PF 263

Case Nos. PF-2011-60, PF-2011-62, PF-2011-66, PF-2011-67, and PF-2011-82

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

Respondent.

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-entitled proceedings that the following matters are true:

**PARTIES**

1. Julia Ansel (Complainant) is the Bureau Chief of the Professional Fiduciaries Bureau. She brought this action solely in her official capacity and is represented in this matter by Kamala D. Harris, Attorney General of the State of California, by Aspasia A. Papavassiliou, Deputy Attorney General.

2. Respondent Christine M. Backhouse (Respondent) is represented in this proceeding by attorneys Francis B. Doyle and John F. Doyle, whose address is: WealthPLAN LLP, 1960 The Alameda, Suite 185, San Jose, CA 95126.

3. On or about December 9, 2008, the Professional Fiduciaries Bureau issued Professional Fiduciary License No. PF 263 to Christine M. Backhouse (Respondent). The

1 Professional Fiduciary License was in full force and effect at all times relevant to the charges  
2 brought in Accusation No. PF-2011-60 and will expire on December 31, 2014, unless renewed.

3 JURISDICTION

4 4. The Accusation in Case Nos. PF-2011-60, PF-2011-62, PF-2011-66, PF-2011-67, and  
5 PF-2011-82 was filed before the Director of Consumer Affairs (Director), for the Professional  
6 Fiduciaries Bureau (Bureau), and is currently pending against Respondent. The Accusation and  
7 all other statutorily required documents were properly served on Respondent on December 3,  
8 2013. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of the  
9 Accusation is attached as exhibit A and incorporated by reference.

10 ADVISEMENT AND WAIVERS

11 5. Respondent has carefully read, fully discussed with counsel, and understands the  
12 charges and allegations in the Accusation in Case Nos. PF-2011-60, PF-2011-62, PF-2011-66,  
13 PF-2011-67, and PF-2011-82. Respondent has also carefully read, fully discussed with counsel,  
14 and understands the effects of this Stipulated Settlement and Disciplinary Order.

15 6. Respondent is fully aware of her legal rights in this matter, including the right to a  
16 hearing on the charges and allegations in the Accusation; the right to be represented by counsel at  
17 her own expense; the right to confront and cross-examine the witnesses against her; the right to  
18 present evidence and to testify on her own behalf; the right to the issuance of subpoenas to  
19 compel the attendance of witnesses and the production of documents; the right to reconsideration  
20 and court review of an adverse decision; and all other rights accorded by the California  
21 Administrative Procedure Act and other applicable laws.

22 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and  
23 every right set forth above.

24 CULPABILITY

25 8. Respondent understands and agrees that the charges and allegations in the Accusation  
26 in Case Nos. PF-2011-60, PF-2011-62, PF-2011-66, PF-2011-67, and PF-2011-82, if proven at a  
27 hearing, constitute cause for imposing discipline upon her Professional Fiduciary License.

28       ///

1       9. For the purpose of resolving the Accusation without the expense and uncertainty of  
2 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual  
3 basis for the charges in the Accusation, and that Respondent hereby gives up her right to contest  
4 those charges in this administrative proceeding.<sup>1</sup>

5       10. Respondent agrees that her Professional Fiduciary License is subject to discipline and  
6       she agrees to be bound by the Director's imposition of discipline as set forth in the Disciplinary  
7       Order below.

## RESERVATION

9        11. The admissions made by Respondent in this stipulation are only for the purposes of  
10 this proceeding, or any other proceedings in which the Professional Fiduciaries Bureau or other  
11 professional licensing agency is involved, and shall not be admissible in any other criminal or  
12 civil proceeding.

## CONTINGENCY

14        12. This stipulation shall be subject to approval by the Director of Consumer Affairs or  
15        Director's designee. Respondent understands and agrees that counsel for Complainant and the  
16        staff of the Professional Fiduciaries Bureau may communicate directly with the Director and the  
17        staff of the Department of Consumer Affairs regarding this stipulation and settlement, without  
18        notice to or participation by Respondent or her counsel. By signing the stipulation, Respondent  
19        understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation  
20        prior to the time the Bureau considers and acts upon it. If the Director fails to adopt this  
21        stipulation as the Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of  
22        no force or effect, except for this paragraph, it shall be inadmissible in any legal action between

<sup>1</sup> In mitigation, Respondent states that before she signed the wire transfer agreement, a Heritage Bank employee informed her that Mr. Kennedy would only be able confirm wire transfers that she initiated, not initiate wire transfers himself. Respondent states she relied on that representation. In addition, Respondent states that if the bank employee misinformed her regarding the agreement and the bank considered Mr. Kennedy to be authorized to initiate wire transfers, the bank should have attempted to confirm with Respondent any wire transfers that Mr. Kennedy initiated.

the parties, and the Director shall not be disqualified from further action by having considered this matter.

13. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Settlement and Disciplinary Order, including Portable Document Format (PDF) and facsimile signatures thereto, shall have the same force and effect as the originals.

6        14. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an  
7 integrated writing representing the complete, final, and exclusive embodiment of their agreement.  
8 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,  
9 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary  
10 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a  
11 writing executed by an authorized representative of each of the parties.

12        15. In consideration of the foregoing admissions and stipulations, the parties agree that  
13        the Director may, without further notice or formal proceeding, issue and enter the following  
14        Disciplinary Order:

## DISCIPLINARY ORDER

16 IT IS ORDERED that Professional Fiduciary License No. PF 263 issued to Christine M.  
17 Backhouse (Respondent) is revoked.

18       1. If Respondent applies for a new professional fiduciary license, all of the charges and  
19 allegations contained in the Accusation in Case Nos. PF-2011-60, PF-2011-62, PF-2011-66, PF-  
20 2011-67, and PF-2011-82 shall be deemed to be true, correct and admitted by Respondent when  
21 the Professional Fiduciaries Bureau determines whether to grant or deny the application.

22       2. If the Professional Fiduciaries Bureau is to issue Respondent a new license,  
23 Respondent must first reimburse the Bureau its costs of investigation and enforcement in the  
24 amount of \$10,496.25.

## ACCEPTANCE

26 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully  
27 discussed it with my attorneys, Francis B. Doyle and John F. Doyle. I understand the stipulation  
28 and the effect it will have on my Professional Fiduciary License.

1 I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and  
2 intelligently, and agree to be bound by the Decision and Order of the Director of Consumer  
3 Affairs.

4 DATED: \_\_\_\_\_

5 CHRISTINE M. BACKHOUSE  
Respondent

6 I have read and fully discussed with Respondent Christine M. Backhouse the terms and  
7 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.  
8 I approve its form and content.

9 DATED: \_\_\_\_\_

10 Francis B. Doyle  
Attorney for Respondent

11 I have read and fully discussed with Respondent Christine M. Backhouse the terms and  
12 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.  
13 I approve its form and content.

14 DATED: \_\_\_\_\_

15 John F. Doyle  
Attorney for Respondent

16 ENDORSEMENT

17 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully  
18 submitted for consideration by the Director of Consumer Affairs.

19 Dated:

Respectfully submitted,

20 KAMALA D. HARRIS  
21 Attorney General of California  
22 DIANN SOKOLOFF  
23 Supervising Deputy Attorney General

24 ASPASIA A. PAPAVASSILIOU  
25 Deputy Attorney General  
26 Attorneys for Complainant

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I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Director of Consumer Affairs.

6 | DATED:

10/9/2014

CHRISTINE M. BACKHOUSE  
Respondent

8 I have read and fully discussed with Respondent Christine M. Backhouse the terms and  
9 conditions and other matters contained in the above ~~Stipulated~~ Settlement and Disciplinary Order.  
10 I approve its form and content. [REDACTED]

11 | DATED:

10/9/2014

Francis B. Doyle  
Attorney for Respondent

13 I have read and fully discussed with Respondent Christine M. Backhouse the terms and  
14 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.  
15 I approve its form and content. [REDACTED]

16 || DATED:

10/9/14

~~John F. Doyle  
Attorney for Respondent~~

#### ENDORSEMENT

19 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully  
20 submitted for consideration by the Director of Consumer Affairs.

21 Dated: Nov. 19, 2014

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
DIANN SOKOLOFF  
Supervising Deputy Attorney General

ASPASIA A. PAPAVASSILIOU  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Accusation in Case Nos. PF-2011-60, PF-2011-62, PF-2011-66, PF-2011-67, and PF-2011-82**

1 KAMALA D. HARRIS  
2 Attorney General of California  
3 DIANN SOKOLOFF  
4 Supervising Deputy Attorney General  
5 ASPASIA A. PAPAVASSILIOU  
6 Deputy Attorney General  
7 State Bar No. 196360  
8 1515 Clay Street, 20th Floor  
9 P.O. Box 70550  
10 Oakland, CA 94612-0550  
11 Telephone: (510) 622-2199  
12 Facsimile: (510) 622-2270  
13 E-mail: Aspasia.Papavassiliou@doj.ca.gov  
14 *Attorneys for Complainant*

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BEFORE THE  
PROFESSIONAL FIDUCIARIES BUREAU  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

CHRISTINE M. BACKHOUSE  
[REDACTED]

Professional Fiduciary License No. PF 263

Respondent.

Case Nos. PF-2011-60, PF-2011-62, PF-  
2011-66, PF-2011-67, and PF-2011-82

ACCUSATION

Complainant alleges:

PARTIES

1. Julia Ansel (Complainant) brings this Accusation solely in her official capacity as the  
Bureau Chief of the Professional Fiduciaries Bureau (Bureau), Department of Consumer Affairs.<sup>1</sup>

2. On or about December 9, 2008, the Bureau issued Professional Fiduciary License  
Number PF 263 to Christine M. Backhouse (Respondent). The Professional Fiduciary License  
was in full force and effect at all times relevant to the charges brought in this Accusation and will  
expire on December 31, 2013, unless renewed.

///

<sup>1</sup> The Bureau was established in 2007, under authority of Business and Professions Code  
section 6510, to regulate non-family member professional fiduciaries, including conservators,  
guardians, trustees, and agents under durable power of attorney, as defined by the Professional  
Fiduciaries Act (Bus. & Prof. Code § 6500 *et seq.*).

## JURISDICTION

2       3. This Accusation is brought before the Bureau, Department of Consumer Affairs. All  
3 section references are to the Business and Professions Code unless otherwise indicated.

4       4. Section 6501, subdivision (f)(2), provides in pertinent part that the term "professional  
5 fiduciary" includes a person who acts as a trustee for more than three unrelated individuals.

6       5. Section 118, subdivision (b), of the Code provides that the suspension, expiration,  
7       surrender, or cancellation of a license shall not deprive the Bureau of jurisdiction to proceed with  
8       a disciplinary action during the period within which the license may be renewed, restored;  
9       reissued or reinstated.

## STATUTORY AND REGULATORY PROVISIONS

11 6. Code section 6584 states in pertinent part:

12 "A license issued under this chapter may be suspended, revoked, denied, or other  
13 disciplinary action may be imposed for one or more of the following causes:

14.

15        "(d) Fraud, dishonesty, corruption, willful violation of duty, gross negligence or  
16 incompetence in practice, or unprofessional conduct in, or related to, the practice of a professional  
17 fiduciary. For purposes of this section, unprofessional conduct includes, but is not limited to, acts  
18 contrary to professional standards concerning any provision of law substantially related to the  
19 duties of a professional fiduciary."

20 7. Probate Code section 16012 states in pertinent part:

21        "(a) The trustee has a duty not to delegate to others the performance of acts that the trustee  
22 can reasonably be required personally to perform and may not transfer the office of trustee to  
23 another person nor delegate the entire administration of the trust to a cotrustee or other person.

24        "(b) In a case where a trustee has properly delegated a matter to an agent, cotrustee, or other  
25 person, the trustee has a duty to exercise general supervision over the person performing the  
26 delegated matter."

27       8.     California Code of Regulations, title 16, section 4476, subdivision (c), provides that  
28 the licensed professional fiduciary shall protect the rights of the consumer and the estate against

1 infringement by third parties.

2       9. California Code of Regulations, title 16, section 4482, subdivision (a), provides that  
3 the licensed professional fiduciary shall protect the assets of the estate.

4       10. California Code of Regulations, title 16, section 4482, subdivision (f), provides that  
5 the licensed professional fiduciary shall manage the estate with prudence, care and judgment,  
6 maintaining detailed fiduciary records as required by law.

## COST RECOVERY PROVISION

8       11. Section 125.3 of the Code provides that the Bureau may request an administrative law  
9 judge to direct a licentiate found to have committed a violation or violations of the licensing act to  
10 pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case,  
11 with failure of the licentiate to comply subjecting the license to not being renewed or reinstated.  
12 If a case settles, recovery of investigation and enforcement costs may be included in a stipulated  
13 settlement.

## FACTUAL BACKGROUND

15        12. Beginning approximately in 2007 and continuing until approximately February 2012,  
16 Respondent's longtime live-in boyfriend Leo "Josh" Kennedy, diverted approximately \$16.2  
17 million from approximately 37 client accounts that Respondent managed as a trustee and  
18 professional fiduciary. Kennedy diverted the funds primarily to start and invest in technology  
19 companies and real estate ventures for his own benefit, without any knowledge by, or benefit to,  
20 the trust beneficiaries.

21       13. Respondent believes that Kennedy diverted the funds by using Respondent's  
22 photocopied signature on facsimile wire transfer requests, using signed blank checks that were  
23 only to be used when Respondent was out of the country, using Respondent's signature stamp that  
24 was kept in Respondent's office, or, beginning in approximately December 2009, using his own  
25 signature on wire transfer requests.

26 14. On or about December 14, 2009, Respondent signed a wire transfer agreement with  
27 Heritage Bank of Commerce designating Respondent and Kennedy as "Authorized  
28 Representatives (agents)" of Customer "Backhouse Fiduciary Services, Inc.," the company that

1 Respondent operated to manage her client trust accounts and under which she held all her client  
2 trust accounts at the bank. The wire transfer agreement listed Respondent as "President/Trustee"  
3 and Kennedy as "Controller." Respondent states that the agreement meant that Kennedy could  
4 only verify wire transfer requests that she initiated rather than initiate requests on his own.<sup>2</sup> If  
5 there was such a distinction, however, it was not explicit, and the agreement paved the way for  
6 Kennedy to begin signing wire transfer requests that were accepted by the bank.<sup>3</sup>

7 15. Respondent stated to a Bureau investigator that Kennedy served as her "assistant" or  
8 "consultant" and that she authorized him to input information on the trusts she managed into her  
9 trust accounting computer program, Probate Plus. Kennedy concealed his diversion of funds from  
10 Respondent by entering incorrect information into the Probate Plus program.

11 16. The Bureau has received consumer complaints for at least three of the trusts that  
12 Respondent managed, indicating that, in at least some cases, Kennedy emptied the accounts that  
13 he raided, as described below.

14 *Re: Kennedy Trust, Complaint Nos. PF-2011-60 and PF-2011-62*  
15 A. Respondent became the professional fiduciary for the [REDACTED] around 2010.<sup>4</sup>  
16 The trust was worth approximately \$2 million: it had approximately \$300,000 in liquid assets  
17 when Respondent became the trustee; then, in December 2010, commercial properties belonging  
18 to the trust sold for \$1.3 million; and finally, a house belonging to the trust sold in late 2011 for  
19 approximately \$500,000. Respondent never provided any disbursement to the beneficiaries, and  
20 in March 2012, after the beneficiaries' repeated inquiries regarding the status of their funds,  
21 Respondent informed the beneficiaries that the trust had less than \$23,000 remaining.

22       ///

23       <sup>2</sup> The agreement states, in part: "Upon receipt of wire transfer request via facsimile or other  
24 electronic means, Bank will contact another individual designated as an Authorized  
25 Representative on Agreement to verify the authenticity of the request. If a second individual is  
not available, confirmation may be made from an originator of the request."

26       <sup>3</sup> Kennedy made liberal use of his apparent authority to sign for wire transfers. For  
27 example, from on or about April 29, 2011, to on or about November 28, 2011, he signed  
28 approximately 50 wire transfer requests to divert about \$4.5 million from client trust accounts  
managed by Respondent.

29       <sup>4</sup> What is referred to collectively here as the "Kennedy Trust" consisted of three entities  
(two trusts and a limited liability corporation) with the same beneficiaries.

The [REDACTED] t, Complaint Nos. PF-2011-66 and PF-2011-67

2 B. Respondent became the professional fiduciary for the "SULLIVAN" in or around  
3 January 22, 2010. Approximately two years later, in January 2012, after one of the beneficiaries  
4 called Respondent to complain that he had not received a promised disbursement check,  
5 Respondent instructed Kennedy to send checks to the beneficiaries. Kennedy sent checks to at  
6 least two beneficiaries, with each check in the amount of almost \$330,000, but he subsequently  
7 placed a "stop payment" order on the checks. When a third beneficiary called Respondent about  
8 disbursement on or around February 7, 2012, Respondent confronted Kennedy, who confessed  
9 that "the money was not there" and that it was "all gone."

The [REDACTED], Complaint No. PF-2011-82

11 C. Respondent became the professional fiduciary for the "C. C. H. T." in or around  
12 2010 or 2011. By late 2011 or early 2012, the approximately \$890,000 deposited for the trust at  
13 Heritage Bank of Commerce was gone.

## FIRST CAUSE FOR DISCIPLINE

(Unprofessional Conduct: Violation of Professional Fiduciaries Code of Ethics)  
(Bus. & Prof. Code § 6584, subd. (d))

16        17. Respondent has subjected her professional fiduciary license to disciplinary action  
17 because she engaged in unprofessional conduct by violating the Professional Fiduciaries Code of  
18 Ethics. (Bus. & Prof. Code § 6584, subd. (d) and Cal. Code. Regs., tit. 16, §§ 4740, *et seq.*)  
19 Respondent violated the Professional Fiduciaries Code of Ethics when she failed to protect an  
20 estate against infringement by third parties; failed to protect the assets of an estate; and failed to  
21 manage an estate with prudence, care and judgment. (Cal. Code Regs., tit. 16, §§ 4476 subd. (c),  
22 and 4482, subds. (a) and (f).) The circumstances, as described in paragraphs 12 through 16 above,  
23 are that Respondent gave a third party unfettered access to her client's assets that she was charged  
24 with protecting; failed to monitor or review accountings; and failed to adequately supervise the  
25 third party, which failure enabled him to abscond with assets entrusted to Respondent in her  
26 fiduciary capacity.

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**SECOND CAUSE FOR DISCIPLINE**  
(Willful Violation of Duty)  
(Bus. & Prof. Code § 6584, subd. (d))

3       18. Respondent has subjected her professional fiduciary license to disciplinary action  
4 because she failed to engage in a duty that should be performed by a professional fiduciary,  
5 specifically, the duty not to delegate to others tasks that Respondent as trustee was reasonably  
6 required to perform personally, and, in case of a properly delegated a matter, the duty to exercise  
7 general supervision over the person performing the delegated matter. (Bus. & Prof. Code § 6584,  
8 subd. (d) and Prob. Code § 16012, subds. (a) and (b).) The circumstances of Respondent's willful  
9 violation of duty are, as described in paragraphs 12 through 16, above, that Respondent  
10 demonstrated excessive delegation of her responsibilities and failed to exercise supervision over  
11 the person performing delegated matters. Respondent entered into a wire transfer agreement that  
12 specifically authorized a third party to unilaterally make financial transactions, and she also had  
13 that third party enter her clients' account information into her Probate Plus computer program.  
14 Respondent failed to adequately supervise the third party regarding either matter.

**THIRD CAUSE FOR DISCIPLINE**  
(Incompetence)  
(Bus. & Prof. Code § 6584, subd. (d))

17        19. Respondent has subjected her professional fiduciary license to disciplinary action  
18 because she demonstrated a lack of knowledge or ability in performing professional obligations.  
19 (Bus. & Prof. Code § 6584, subd. (d).) The circumstances are, as described in paragraphs 12  
20 through 16, above, that Respondent lacked knowledge regarding the importance of reviewing  
21 accountings and financial material in her duty to protect her clients (an adequate review of bank  
22 statements would have revealed the diversion of funds) and she lacked the ability to understand  
23 the ramifications of the wire transfer agreement that she signed designating a third party as an  
24 "Authorized Representative."

**FOURTH CAUSE FOR DISCIPLINE**  
(Gross Negligence)  
(Bus. & Prof. Code § 6584, subd. (d))

27        20. Respondent has subjected her professional fiduciary license to disciplinary action  
28 because she engaged in an extreme departure from the standard of practice for a professional

1 fiduciary. (Bus. & Prof. Code § 6584, subd. (d).) The circumstances, as described in paragraphs  
2 12 through 16, above, are that Respondent failed to adequately review bank statements and  
3 compare those statements with accountings generated by her Probate Plus software, and that  
4 Respondent authorized a third party to unilaterally arrange for the wire transfer of funds held for  
5 the benefit of various trusts for which Respondent was the trustee.

6 PRAYER

7 WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this  
8 Accusation, and that following the hearing, the Professional Fiduciaries Bureau, Department of  
9 Consumer Affairs, issue a decision:

- 10 1. Revoking or suspending Professional Fiduciary License Number PF 263, issued to  
11 Christine M. Backhouse;
- 12 2. Ordering Christine M. Backhouse to pay the Professional Fiduciaries Bureau the  
13 reasonable costs of the investigation and enforcement of this case under Business and Professions  
14 Code section 125.3;
- 15 3. Taking such other and further action as deemed necessary and proper.

16  
17 DATED: December 3, 2013 

18 JULIA ANSEL  
19 Bureau Chief  
20 Professional Fiduciaries Bureau  
21 Department of Consumer Affairs  
22 State of California  
23 *Complainant*

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