

1 REAL ESTATE AGENCY
2 BEFORE THE REAL ESTATE COMMISSIONER
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4 In the Matter of the Real Estate License of)
5)
6 CHRISTOPHER C SUESS) STIPULATED FINAL ORDER
7)
8)
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10 The Oregon Real Estate Agency (Agency) and Christopher Suess (Suess) do hereby
11 agree and stipulate to the following:

12 FINDINGS OF FACT
13 AND
14 CONCLUSIONS OF LAW

15 1.

16 1.1 At all times mentioned herein, Suess was licensed as a principal broker with Real
17 Estate Connections (REC).

18 1.2 In January 2025, the Agency issued REC an Educational Letter of Advice after
19 an Agency review found discrepancies in their accounting. The Educational Letter of Advice
20 noted that the reconciliation was not balanced, corrective action was not taken in timely
21 manner, funds were not deposited timely, and there was incorrect bank labelling of the clients'
22 trust account. REC was directed to work on correcting the identified discrepancies.

23 1.3 On November 7, 2025, REC was notified by the Agency that clients' trust account
24 ending in,-2964 (CTA-SD #2964) which holds security deposits, had been selected for
25 reconciliation review. Records for September 2025 were requested.

26 1.4 A review of the Trust Account Reconciliation document showed that the balances
27 of each component did not equal and were not reconciled.

28 1.5 Parts I and II of the Trust Account Reconciliation form noted a balance of
29 \$432,828.64, while Part III noted a balance of \$417,651.50. The Part IV difference was noted
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1 as \$15,177.14, with the explanation for the difference provided was, “39,191.36 Adjust to
2 beginning ledger balance.”

3 1.6 A review of the AppFolio Reconciliation Report identified two outstanding
4 deposits totaling \$39,191.36 from December 2024. The two outstanding deposits were not
5 recorded in Part I of the Trust Account Reconciliation form.

6 1.7 A review of the supporting documentation provided as part of the reconciliation
7 identified the Part I balance should have been recorded as \$469,782.50, the Part II balance
8 should have been recorded as \$399,311.50, and the Part III balance should have been
9 recorded as \$398,124.00.

10 **(1) Conclusion of Law:** By failing to ensure that each part of the reconciliation equaled to
11 and reconciled to each other and to take corrective action to resolve adjustments made in a
12 reconciliation prior to the next reconciliation, Sues violated ORS 696.301(3) and its
13 implementing rule OAR 863-025-0028(3)(b) and OAR 863-025-0028(4) 1/1/2025 Edition.

14 **(2) Conclusion of Law:** The balances reflected on the Trust Account Reconciliation form
15 were inconsistent with the balances in the system generated reports provided by Sues, in
16 violation of ORS 696.301(3) and its implementing rule OAR 863-025-0035(3)(a)(A)-(C)
17 1/1/2025 Edition.

18 1.8 Agency Compliance Specialist Jenifer Wetherbee (Wetherbee) requested Sues
19 provide the September 2025 reconciliation records for clients’ trust account ending in -2956
20 (CTA #2956) as well as clients’ trust account ending in -8812 (CTA #8812).

21 1.9 Sues notified Wetherbee that he had hired an accountant and needed more
22 time to identify why the accounts were not reconciled. Sues provided further explanation,
23 writing “Following the close of our last review, we believed the most effective approach to
24 remedy the discrepancies observed in AppFolio was to create a new AppFolio database, run a
25 simulation, bring it current with the active database, and then transition operations into the new
26 environment. Despite significant effort, this strategy did not resolve the issues.”

27 1.10 Sues was asked to provide a timeline of when he created the new AppFolio
28 database, when it was discovered that this action was not going to correct the issues, when he
29 hired an accountant, and when he believed the accounting issues would be resolved.
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1 1.11 In response, Suess wrote “During our review, we identified October 2020 as the
2 most recent date at which a fully balanced reconciliation occurred. From that point forward, no
3 complete reconciliations were conducted. We are now at a point that we have corrected 10
4 months of reconciliations and brought to current in July of 2021, roughly a year and a half prior
5 to our tenure”

6 1.12 Suess did not provide complete reconciliation records for CTA #8812.

7 1.13 A review of the Trust Account Reconciliation form for CTA #2956 showed Part II
8 was out of balance by \$32,436.22, with no explanation provided. In addition, Suess did not
9 provide the AppFolio Trust Account Balance report, which provides ledger balances, so the
10 balance provided on Part III of the Reconciliation form could not be verified.

11 **(3) Conclusion of Law:** By failing to provide complete reconciliation records upon Agency
12 request, Suess violated ORS 696.301(3) and its implementing rule OAR 863-025-0035(2)(a)
13 1/1/2025 Edition.

14 **(4) Conclusion of Law:** By failing to provide required documentation to support the
15 balances reflected on the Trust Account Reconciliation form, Suess violated ORS 696.301(3)
16 and its implementing rule OAR 863-025-0028(2)(a)(A)-(C) 1/1/2025 Edition.

17 **(5) Conclusion of Law:** By failing to complete the reconciliation within 30 days of the bank
18 statement, as well as failing to take corrective action to resolve adjustments made in a
19 reconciliation prior to the next reconciliation, Suess violated ORS 696.301(3) and its
20 implementing rule OAR 863-025-0028(2)(b) and OAR 863-025-0028(4) 1/1/2025 Edition.

21 1.14 Suess provided a document for outstanding transactions, which identified 76
22 unreconciled deposits, totaling \$118,171.18. There were 51 outstanding disbursements, 7 of
23 which were to REC totaling \$3,395.98, dating back to 2022. In addition, \$18.60 in bank fees
24 were charged to CTA #2956.

25 **(6) Conclusion of Law:** By not disbursing funds owed to REC timely, Suess violated ORS
26 696.301(3) as it incorporates ORS 696.241(5) and ORS 696.301(3) and its implementing rule
27 OAR 863-025-0025(5) and OAR 863-025-0027(6).

28 **(7) Conclusion of Law:** By charging bank fees against clients’ trust account ending in -
29 2956, Suess violated ORS 696.301(3) and its implementing rule OAR 863-025-0025(5)
30 1/1/2025 Edition.

1 and complete agreement and stipulation between the Agency and me. I further understand
2 that if I do not agree with this stipulation, I have the right to request a Hearing on this matter
3 and to be represented by legal counsel at such a Hearing. I also understand that any Hearing
4 would be conducted in accordance with the procedures set forth in ORS Chapter 183 and in
5 accordance with the Rules of Practice and Procedure adopted by the Attorney General of the
6 State of Oregon. By signing this Stipulated Final Order, I freely and voluntarily waive my rights
7 to a Hearing, to representation by legal counsel at such a Hearing, and to judicial review of this
8 matter.

9 I hereby agree and stipulate to the above Findings of Fact and Conclusions of Law and
10 understand that the Order which follows hereafter, which I have also read and understand,
11 may be completed and signed by the Real Estate Commissioner or may be rejected by the
12 Real Estate Commissioner. I further understand that, in accordance with the provisions of
13 ORS 696.445(3), notice of this Order shall be published in the Oregon Real Estate News
14 Journal.

15 In addition to all of the above, I agree that once the Commissioner executes this
16 Stipulated Final Order, I will accept service of the Stipulated Final Order by email, and hereby
17 waive the right to challenge the validity of service.

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ORDER

IT IS HEREBY ORDERED that Christopher Suess' principal broker license be reprimanded.

IT IS FURTHER ORDERED that Suess complete the Agency-hosted Property Management and Reconciliation Requirements course within 6 months of the issuance of this order.

IT IS FURTHER ORDERED that due to the violations addressed above, Suess will be subject to a future client's trust account review within 6 months of the issuance of this order.

IT IS SO STIPULATED:

IT IS SO ORDERED:

Chris Suess
box SIGN 4LJQ9528-176W92XZ



CHRISTOPHER SUESS

STEVEN STRODE

Real Estate Commissioner

Date May 26, 2026

Date _____

Date of Service: _____