

FILED

MAR 10 2020

DEPT. OF REAL ESTATE

By Kevin Sun

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BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of) No. H- 05134 SD
)
12 RAQUEL FRANCESCA REID,) ACCUSATION
13)
14)
15 Respondent.)

16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
17 State of California, for cause of Accusation against RAQUEL FRANCESCA REID
18 (“Respondent”) alleges as follows:

19 1.

20 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
21 State of California, makes this Accusation in her official capacity.

22 2.

23 All references to the “Code” are to the California Business and Professions Code
24 and all references to “Regulations” are to Title 10, Chapter 6, California Code of Regulations.

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1 LICENSE HISTORY

2 3.

3 a. Respondent is presently licensed and/or has license rights under the Real
4 Estate Law, Part 1 of Division 4 of the California Business and Professions Code, as a real
5 estate broker ("REB"), Department of Real Estate¹ ("Department") license ID 01505043.

6 b. The Department originally issued Respondent's REB license on or about
7 January 9, 2013.

8 c. Respondent's REB license is scheduled to expire on June 28, 2021, unless
9 renewed.

10 CAUSE FOR DISCIPLINE

11 (CRIMINAL CONVICTION)

12 4.

13 April 9, 2019; 18 United States Code ("U.S.C.") §1349 et. al.

14 a. On or about September 19, 2017, in the United States District Court, Southern
15 District of California, in Case No. 17CR2897WQH, United States of America v. Peter Cash
16 Doye and Raquel Reid, an indictment was filed against Respondent for violations of:

- 17 (1) one count of 18 U.S.C. §1349 (conspiracy to commit wire fraud),
18 (2) one count of 18 U.S.C. §1343 (wire fraud),
19 (3) two counts of 18 U.S.C. §1341 (mail fraud),
20 (4) two count of 18 U.S.C. §1028A (aggravated identity theft), and
21 (5) one count of 18 U.S.C. §1001(a)(2) (false statement to a Federal Officer).

22 b. On or about November 20, 2018, Respondent pled guilty to all seven counts
23 listed above.

24 c. On or about April 9, 2019, Respondent was found guilty on all seven counts
25 and sentenced to 65 months of imprisonment, attend a Residential Drug Abuse Program, 3
26

27 ¹ Between July 1, 2013 and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate under the Department of Consumer Affairs.

1 years of supervised release upon completion of her imprisonment, and pay restitution in the
2 amount of Forty-Three Million and Eight Hundred and Thirty-Two Thousand and Nine
3 Hundred and One Dollars (\$43,832,901).

4 5.

5 The crimes of which Respondent was convicted, as set forth in Paragraph 4
6 above, by their facts and circumstances, bear a substantial relationship under Section 2910,
7 Title 10, Chapter 6, California Code of Regulations to the qualifications, functions or duties of a
8 real estate licensee and constitute cause under **Code Sections 490 and 10177(b)** for the
9 suspension or revocation of the license and license rights of Respondent under the Real Estate
10 Law.

11 SECOND CAUSE FOR DISCIPLINE
12 (FAILURE TO REPORT)

13 6.

14 Respondent did not report in writing to the Department her felony indictment
15 within thirty (30) days of the filing date (September 19, 2017).

16 7.

17 Respondent did not report in writing to the Department her felony convictions
18 within thirty (30) days of the conviction date (April 9, 2019).

19 8.

20 Respondent's failure to report her felony indictment and convictions constitutes
21 cause for discipline under **Code Section 10186.2²** of the license and license rights of
22 Respondent under the Real Estate Law.

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24 _____
25 ² Pursuant to Business and Professions Code 10186.2: (a)(1) A licensee shall report any of the following to the
26 department: (A) The bringing of an indictment or information charging a felony against the licensee. (B) The
27 conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any felony or
misdemeanor. (c) Any disciplinary action taken by another licensing entity or authority of this state or of another
state or an agency of the federal government. (2)The report required by this subdivision shall be made in writing
within 30 days of the date of the bringing of the indictment or the charging of a felony, the conviction, or the
disciplinary action. (b) Failure to make a report required by this section shall constitute a cause for discipline.

1 COSTS

2 9.

3 **Code Section 10106** provides, in pertinent part, that in any order issued in
4 resolution of a disciplinary proceeding before the Department, the Commissioner may request
5 the administrative law judge to direct a licensee found to have committed a violation of this part
6 to pay a sum not to exceed the reasonable costs of investigation and enforcement of the case.

7 PRAAYER

8 WHEREFORE, Complainant prays that a hearing be conducted on the allegations of
9 this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action
10 against all licenses and/or license rights under the Real Estate Law (Part 1 of Division 4 of the
11 California Business and Professions Code) of Respondent RAQUEL FRANCESCA REID, for
12 the cost of investigation and enforcement as permitted by law, and for such other and further
13 relief as may be proper under applicable provisions of law.

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15 Dated at San Diego, California this 28 day of February, 2020.

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18 
19 Veronica Kilpatrick
20 Supervising Special Investigator

21 cc: RAQUEL FRANCESCA REID
22 Veronica Kilpatrick
23 Sacto.