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FILED

JAN 16 2015

BUREAU OF REAL ESTATE

By *Priscilla Nanni*

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8
9 BEFORE THE BUREAU OF REAL ESTATE

10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-04682 SD
13 OWEN AMECHI EZEOKOLI,) ACCUSATION
14)
15 Respondent.)
16)

17 The Complainant, Veronica Kilpatrick, a Deputy Real Estate Commissioner of
18 the State of California, for cause of Accusation against OWEN AMECHI EZEOKOLI,
19 (“Respondent”) is informed and alleges as follows:

20 1.

21 The Complainant, Veronica Kilpatrick, a Deputy Real Estate Commissioner of
22 the State of California, makes this Accusation in her official capacity.

23 2.

24 Respondent is presently licensed and/or has license rights under the Real Estate
25 Law, Part 1 of Division 4 of the California Business and Professions Code (“Code”), as a real
26
27

CALBRE ACCUSATION – OWEN AMECHI EZEOKOLI

1 estate broker, BRE License ID #01148180. Respondent has one active dba under this license,
2 A T Associates.

3 FIRST CAUSE FOR DISCIPLINE

4 (LICENSE DISCIPLINE BY ANOTHER GOVERNMENT AGENCY)

5 3.

6 On or about June 5, 2014, the California Department of Consumer Affairs,
7 Bureau of Real Estate Appraisers (hereinafter "BREA"), accepted Respondent's surrender of
8 his probationary Certified Residential Real Estate Appraiser License (No. AR030220) pursuant
9 to Respondent's admission of every charge and allegation in BREA Accusation/Petition to
10 Revoke Probation No. C2013081602, including violations of:

- 11 (1) Uniform Standards of Professional Appraisal Practice (hereinafter "USPAP")
12 Standards Rules (hereinafter "S.R.") 1-1(a) (awareness of, understanding, and
13 correctly employing those recognized methods and techniques necessary to
14 produce a credible appraisal);
- 15 (2) USPAP S.R. 1-1(b) (not committing a substantial error of omission or
16 commission that significantly affects an appraisal);
- 17 (3) USPAP S.R. 2-1(a) (written or oral real property appraisal report must
18 clearly and accurately set forth the appraisal in a manner that is not misleading);
- 19 (4) USPAP S.R. 2-1(b) (written or oral real property appraisal report must
20 contain sufficient information to enable the intended users of the appraisal to
21 understand the report properly);
- 22 (5) Conduct Section of the Ethics Rules (appraisal assignments must be
23 performed with impartiality, objectivity, and independence, and without
24 accommodation of personal interests); and
- 25 (6) Respondent also admitted to failing to comply with condition 2 (obey all
26 laws) and condition 6 (appraisal log/work samples) of his probation resulting
27 from BREA Case No. C110322-08.

1 4.

2 The acts resulting in the foregoing actions taken with respect to Respondent's
3 California Certified Residential Real Estate Appraiser license, as alleged herein above in
4 Paragraph 3, constitute cause for the suspension or revocation of the real estate license and
5 license rights of Respondent under Business and Professions Code Section 10177(f).

6 SECOND CAUSE FOR DISCIPLINE
7 (FAILURE TO REPORT DISCIPLINE BY ANOTHER GOVERNMENT AGENCY)

8 5.

9 Respondent did not report in writing to the Bureau of Real Estate ("Bureau") the
10 BREa discipline described in Paragraph 3, within 30 days of the discipline date (effective June
11 5, 2014). Respondent's failure to timely report the discipline of his Certified Residential Real
12 Estate Appraiser license constitutes cause for discipline under Business and Professions Code
13 Section 10186.2¹ of the license and license rights of Respondent under the Real Estate Law.
14

15 COSTS OF INVESTIGATION AND ENFORCEMENT

16 6.

17 Code Section 10106 provides, in pertinent part, that in any order issued in
18 resolution of a disciplinary proceeding before the Bureau of Real Estate, the Commissioner may
19 request the administrative law judge to direct a licensee found to have committed a violation of
20 this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of
21 the case.
22

23 ¹ Pursuant to Business and Professions Code 10186.2: (a)(1) A licensee shall report any of the following to the
24 department: (A) The bringing of an indictment or information charging a felony against the licensee. (B) The
25 conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any felony or
26 misdemeanor. (c) Any disciplinary action taken by another licensing entity or authority of this state or of another
27 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 WHEREFORE, Complainant prays that a hearing be conducted on the
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3 disciplinary action against all licenses and license rights of Respondent OWEN AMECHI
4 EZEOKOLI under the Real Estate Law (Part 1 of Division 4 of the Business and Professions
5 Code), for the cost of investigation and enforcement as permitted by law, and for such other and
6 further relief as may be proper under other provisions of law.

7 Dated at San Diego, California

8 this 16 day of December, 2014.

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11 VERONICA KILPATRICK
12 Deputy Real Estate Commissioner
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22 cc: OWEN AMECHI EZEOKOLI
23 Veronica Kilpatrick
24 Sacto.
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