

Flag facts

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FILED

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BUREAU OF REAL ESTATE

By *[Signature]*

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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,) **FIRST AMENDED**
14) **ACCUSATION**
15 Respondent.)
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17 The Accusation filed on April 22, 2015 is amended in its entirety as follows:
18 The Complainant, Veronica Kilpatrick, a Deputy Real Estate Commissioner of
19 the State of California, for cause of Accusation against OWEN AMECHI EZEOKOLI,
20 (“Respondent”) is informed and alleges as follows:

21 1.

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

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2.

Respondent is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code (“Code”), as a real estate broker, BRE License ID #01148180. Respondent has one active dba under this license, A T Associates.

FIRST CAUSE FOR DISCIPLINE

(NEGLIGENCE OR INCOMPETENCE IN PERFORMANCE OF ACT FOR WHICH A LICENSE IS REQUIRED)

3.

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

- (1) Uniform Standards of Professional Appraisal Practice (hereinafter “USPAP”) Standards Rules (hereinafter “S.R.”) 1-1(a) (awareness of, understanding, and correctly employing those recognized methods and techniques necessary to produce a credible appraisal);
- (2) USPAP S.R. 1-1(b) (not committing a substantial error of omission or commission that significantly affects an appraisal);
- (3) USPAP S.R. 2-1(a) (written or oral real property appraisal report must clearly and accurately set forth the appraisal in a manner that is not misleading);
- (4) USPAP S.R. 2-1(b) (written or oral real property appraisal report must contain sufficient information to enable the intended users of the appraisal to understand the report properly);

1 (5) Conduct Section of the Ethics Rules (appraisal assignments must be
2 performed with impartiality, objectivity, and independence, and without
3 accommodation of personal interests); and

4 (6) Respondent also admitted to failing to comply with condition 2 (obey all
5 laws) and condition 6 (appraisal log/work samples) of his probation resulting
6 from BREA Case No. C110322-08.

7 4.

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

12 SECOND CAUSE FOR DISCIPLINE
13 (FAILURE TO REPORT DISCIPLINE BY ANOTHER GOVERNMENT AGENCY)

14 5.

15 Respondent did not report in writing to the Bureau of Real Estate ("Bureau") the
16 BREA discipline described in Paragraph 3, within 30 days of the discipline date (effective June
17 5, 2014). Respondent's failure to timely report the discipline of his Certified Residential Real
18 Estate Appraiser license constitutes cause for discipline under **Business and Professions Code**
19 **Section 10186.2¹** of the license and license rights of Respondent under the Real Estate Law.

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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 COSTS OF INVESTIGATION AND ENFORCEMENT

2 6.

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

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

14 Dated at San Diego, California

15 this 10 day of June, 2015.

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17 _____
18 VERONICA KILPATRICK
19 Deputy Real Estate Commissioner

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24 cc: OWEN AMECHI EZEOKOLI
25 Veronica Kilpatrick
26 Sacto.
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