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FILED

MAR 15 2017

BUREAU OF REAL ESTATE

By *Adelino*

BEFORE THE BUREAU OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of	)	No. H-04888 SD
	)	
JORGE PETRO,	)	<u>ACCUSATION</u>
	)	
Respondent.	)	
	)	

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for cause of Accusation against JORGE PETRO, a.k.a. JORGE ALBERTO PETRO ("Respondent"), is informed and alleges as follows:

1.

The Complainant, Veronica Kilpatrick, acting in her official capacity as a Supervising Special Investigator of the State of California, makes this Accusation against JORGE PETRO.

2.

Respondent presently 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 salesperson.

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Accusation of Jorge Petro

FIRST CAUSE OF ACTION
(PRIOR LICENSE DISCIPLINE)

3.

Respondent is the President of Petro Group, Inc., DBA Petro Auto Care.

4.

The Bureau of Automotive Repair of the State of California issued an
Automotive Repair Dealer Registration to Petro Group, Inc. on October 29, 2004.

5.

In aggravation, on or about October 18, 2010, the Director of Consumer Affairs,
in Bureau of Automotive Repair Case No. 77/08-13 and OAH No. 2010020991, adopted the
Proposed Decision of the Administrative Law Judge and permanently invalidated Petro
Group, Inc.'s Automotive Repair Dealer Registration, with execution of the invalidation stayed
and placed Petro Group, Inc. on probation for three years, subject to conditions, including a
suspension for the first 10 days of probation. Within the Proposed Decision, the Administrative
Law Judge held that Petro Group, Inc. violated California Business and Professions Code
Section 9884.7(a)(1) (False Or Misleading Statements) and Business and Professions Code
Section 9884.7(a)(4) (Fraud).

6.

On or about June 6, 2014, the Director of Consumer Affairs, in Bureau of
Automotive Repair Case No. 77/10-41 and OAH No. 2010070662, adopted the Proposed
Decision of the Administrative Law Judge and permanently invalidated Petro Group, Inc.'s
Automotive Repair Dealer Registration. Within the Proposed Decision, the Administrative
Law Judge held that Petro Group, Inc. violated California Business and Professions Code
Section 9884.7(a)(1) (False Or Misleading Statements) and Business and Professions Code
Section 9884.7(a)(4) (Fraud).

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1 7.

2 The prior license discipline against Respondent, as described in Paragraph 6
3 above, constitutes cause under Section 10177(f) of the Code for the suspension or revocation of
4 all the licenses and license rights of Respondent under the Real Estate Law.

5 SECOND CAUSE OF ACTION
6 (FRAUD OR DISHONEST DEALING)

7 8.

8 On or about March 18, 2014, a hearing was held before the Office of
9 Administrative Hearings in the matter described in Paragraph 6 above. Respondent testified at
10 the proceedings. During Respondent's testimony, Respondent stated, "I also like to add that
11 about the other accusations of being fraudulent and that I do deceit, that I do not conduct
12 business in that manner." During Respondent's testimony, Respondent also stated, "And we
13 also based on the community and on the cars that we work on with the consumer, we don't have
14 an issue or any problems."

15 9.

16 The conduct described in Paragraph 8 above involves dishonesty, fraud, or
17 deceit, which constitutes cause for the suspension or revocation of all real estate licenses and
18 license rights of Respondent under the provisions of Code Section 10177(j).

19 10.

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

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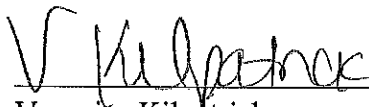
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1 WHEREFORE, Complainant prays that a hearing be conducted on the
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3 disciplinary action against all the licenses and license rights of Respondent JORGE PETRO
4 under the Real Estate Law, for the cost of investigation and enforcement as permitted by law,
5 and for such other and further relief as may be proper under other applicable provisions of law.
6

7 Dated at San Diego, California

8 this 14 day of March, 2017

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10 
11 Veronica Kilpatrick
12 Supervising Special Investigator
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14 cc: JORGE PETRO
15 Christina Sarah DBA International Investments
16 Veronica Kilpatrick
17 Sacto.
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