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FILED

APR 11 2017

BUREAU OF REAL ESTATE

By John Aguil

8 BEFORE THE BUREAU OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of) No. H-04892 SD
12)
13 CHRISTOPHER RYAN FARMER,) ACCUSATION
14)
15 Respondent.)

16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
17 State of California, for cause of Accusation against CHRISTOPHER RYAN FARMER,
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 Respondent has license rights under the Real Estate Law, Part 1 of Division 4 of
24 the California Business and Professions Code (“Code”), as a real estate salesperson.

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ACCUSATION OF
CHRISTOPHER RYAN FARMER

1 (CRIMINAL CONVICTIONS)

2 3.

3 On or about June 21, 2016, in the Superior Court of California, County of San
4 Diego, Case No. M214347DV, Respondent was convicted of violating Penal Code Section
5 245(a)(4) (assault by means likely to produce great bodily injury), a misdemeanor, Penal Code
6 Section 422 (making a criminal threat), a misdemeanor, Penal Code Section 273.5(a) (corporal
7 injury to spouse), a misdemeanor, Penal Code section 243(e)(1) (battery of a spouse), a
8 misdemeanor, and Penal Code Section 594(a)(b)(2)(A) (vandalism under \$400), a
9 misdemeanor. Respondent was placed on probation for three (3) years and was ordered to serve
10 two (2) days in county jail. Respondent's probation terms include the completion of a fifty two
11 (52) week domestic violence program, fifteen (15) days of public service, and the payment of
12 various fees and fines.

13 4.

14 The convictions described in Paragraph 3 bear a substantial relationship under
15 Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications,
16 functions, or duties of a real estate licensee.

17 5.

18 The convictions described in Paragraph 3 constitute cause under Sections 490
19 and 10177(b)(1) of the Code for the suspension or revocation of the license and license rights of
20 Respondent under the Real Estate Law.

21 (INVESTIGATION AND ENFORCEMENT COSTS)

22 6.

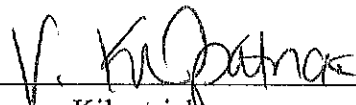
23 California Business and Professions Code Section 10106, provides, in pertinent
24 part, that in any order issued in resolution of a disciplinary proceeding before the Bureau of
25 Real Estate, the Commissioner may request the administrative law judge to direct a licensee
26 found to have committed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

ACCUSATION OF
CHRISTOPHER RYAN FARMER

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 CHRISTOPHER
4 RYAN FARMER under the Real Estate Law for the cost of investigation and enforcement as
5 permitted by law, and for such other and further relief as may be proper under other applicable
6 provisions of law.

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8 Dated at San Diego, California

9 this 22 day of March, 2017

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12 _____
13 Veronica Kilpatrick
14 Supervising Special Investigator

15 cc: CHRISTOPHER RYAN FARMER
16 TD Holdings I Inc
17 Veronica Kilpatrick
18 Sacto.

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ACCUSATION OF
CHRISTOPHER RYAN FARMER