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FILED

JAN 31 2019

DEPT. OF REAL ESTATE

By Angel Alarcon

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of	)	No. H-05045 SD
	)	
ALICIA V. CAMPOS,	)	<u>ACCUSATION</u>
	)	
Respondent.	)	

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for cause of Accusation against ALICIA V. CAMPOS ("Respondent") alleges as follows:

1.

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

2.

A. 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 salesperson ("RES") Department of Real Estate ("Department" or "DRE") license ID 01274649.

DRE Accusation – ALICIA V. CAMPOS

1 B. Respondent was first issued a RES license by the DRE on or February 8,
2 2000.

3 C. Respondent's RES license will expire on May 1, 2000.

4 FIRST CAUSE FOR DISCIPLINE

5 (CRIMINAL CONVICTION)

6 3.

7 June 13, 2018: Penal Code Section 506 - Felony

8 A. On or about February 16, 2018, in the Superior Court of California, Imperial
9 County, in Case No. JCF37545, The People of the State of California vs. Alicia Campos,
10 Respondent pled *nolo contendere* to violating Penal ("PC") Section 506 (embezzlement
11 exceeding \$950 in value), a felony.

12 B. On or about June 13, 2018, the court sentenced Respondent to three (3) years
13 summary probation and ordered Respondent to pay court fees and fines. In addition,
14 Respondent was ordered to stay away from the victim.

15 4.

16 The crime of which Respondent was convicted, by its facts and circumstances,
17 bears a substantial relationship under Section 2910, Title 10, Chapter 6, California Code of
18 Regulations to the qualifications, functions or duties of a real estate licensee and constitute
19 cause under **Code Sections 490 and 10177(b)** for the suspension or revocation of the license
20 and license rights of Respondent under the Real Estate Law.

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1 SECOND CAUSE FOR DISCIPLINE

2 (FAILURE TO REPORT)

3 5.

4 Respondent did not report in writing to the Department, the aforementioned
5 misdemeanor conviction in Imperial County Case No. JCF37545, as described above in
6 Paragraph 3, within thirty (30) days of the conviction date (June 13, 2018).

7 6.

8 Respondent's failure to report the conviction in Imperial County Case No.
9 JCF37545 constitutes cause for discipline under **Code Section 10186.2¹** of the license and
10 license rights of Respondent under the Real Estate Law.

11 COSTS

12 7.

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

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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 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/or license rights under the Real Estate Law (Part 1 of
4 Division 4 of the California Business and Professions Code) of Respondent ALICIA V.
5 CAMPOS, for the cost of investigation and enforcement as permitted by law, and for such
6 other and further relief as may be proper under applicable provisions of law.

7 Dated at San Diego, California

8 this 28 day of January, 2019.

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11 
12 Veronica Kilpatrick
13 Supervising Special Investigator
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15 cc: ALICIA V. CAMPOS
16 Goyal Group Inc
17 Veronica Kilpatrick
18 Sacto.
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