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FILED

MAR 17 2020

DEPT. OF REAL ESTATE

By 

9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-05131 SD
13 CHRISTOPHER RYAN FARMER,) ACCUSATION
14 Respondent.)
15)

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 presently has license rights under the Real Estate Law, Part 1 of
24 Division 4 of the California Business and Professions Code (“Code”), as a restricted real estate
25 salesperson (License ID 01980471). Respondent’s restricted real estate salesperson license will
26 expire on January 1, 2022.

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ACCUSATION

1 (RESTRICTED LICENSE)

2 3.

3 On or about January 2, 2018, a restricted real estate salesperson license was
4 issued by the Department of Real Estate to Respondent on the terms, conditions and restrictions
5 set forth in the Real Estate Commissioner's Order of December 7, 2017, in Case No. H-04892
6 SD.

7 4.

8 Included in said terms, conditions and restrictions were the following:

9 "1. The restricted license issued to respondent may be suspended prior to
10 hearing by Order of the Real Estate Commissioner in the event of respondent's conviction or
11 plea of nolo contendere to a crime which is substantially related to respondent's fitness or
12 capacity as a real estate licensee.

13 2. The restricted license issued to respondent may be suspended prior to
14 hearing by Order of the Real Estate Commissioner on evidence satisfactory to the
15 Commissioner that respondent has violated provisions of the California Real Estate Law, the
16 Subdivided Lands Law, Regulations of the Real Estate Commissioner or conditions attaching to
17 the restricted license."

18 (CRIMINAL CONVICTIONS)

19 5.

20 On or about June 25, 2019, in the Superior Court of California, County of San
21 Diego, Case No. CN397207, Respondent was convicted on a plea of guilty for violation of
22 Vehicle Code section 23153(b) (DUI over 0.08% BAC level causing bodily injury), a
23 misdemeanor, with enhanced penalties for violation of Vehicle Code section 23578 (high BAC
24 level over 0.15%). The court suspended the imposition of sentence and placed Respondent on
25 five (5) years of summary probation on certain terms and conditions, including in part, 5 days of
26 jail time, completion of a MADD program, completion of a 9 month DUI program, and
27 payment of fines and fees.

ACCUSATION

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 CHRISTOPHER RYAN
4 FARMER under the Real Estate Law, for the costs 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 27 day of February, 2020.

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12 
13 Veronica Kilpatrick
14 Supervising Special Investigator

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23 cc: CHRISTOPHER RYAN FARMER
24 TD Holdings I Inc.
25 Veronica Kilpatrick
26 Sacto.