

1 KATHY YI, Counsel (SBN 236736)
2 Department of Real Estate
3 320 West 4th Street, Suite 350
4 Los Angeles, California 90013-1105
5 Telephone: (213) 576-6982
6 Direct: (213) 576-6940
7 Fax: (213) 576-6917
8 *Attorney for Complainant*

FILED

MAY 28 2020

DEPT. OF REAL ESTATE

By John Aguirre

9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

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12 In the Matter of the Accusation of) No. H-05152 SD
13 DARLENE MARIE BOWERS,) ACCUSATION
14 Respondent.)
15 _____)

16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
17 State of California, for cause of Accusation against DARLENE MARIE BOWERS, a.k.a.
18 "Darlene Marie Coonrad" and "Darlene Marie Coonard" ("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 real estate broker
25 (License ID 01249749). Respondent's license is set to expire on August 27, 2022, unless
26 renewed.

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ACCUSATION

(CRIMINAL CONVICTION)

3.

On or about June 14, 2019, in the Superior Court of California, County of San Diego, Case No. SCD274137, Respondent was convicted on a plea of guilty for violation of Penal Code section 278.5(a) (child abduction by depriving right to custody or visitation), a felony. The court sentenced Respondent to 3 years of formal probation and the payment of restitution, fines and fees.

4.

The conviction, as described in Paragraph 3 above, bears a substantial relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real estate licensee.

5.

The crime for which Respondent was convicted, as described in Paragraph 3 above, constitutes cause under Code sections 490 and 10177(b) for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

(COSTS OF INVESTIGATION AND ENFORCEMENT)

6.

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

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