

**FILED**

**JUN 11 2020**

**DEPT. OF REAL ESTATE**

*Calif. State Bar*

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9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 \* \* \*

12 In the Matter of the Accusation of ) No. H-05158 SD  
13 )  
14 RONALD DEE SCHOONOVER, ) ACCUSATION  
15 )  
16 Respondent. )  
17 )

18 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the  
19 State of California, for cause of Accusation against RONALD DEE SCHOONOVER  
20 ("Respondent"), alleges as follows:

21 1.

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

24 2.

25 Respondent presently has license rights under the Real Estate Law, Part 1 of  
26 Division 4 of the California Business and Professions Code ("Code"), as a real estate broker  
27 (License ID 01266611). Respondent's license is scheduled to expire on April 3, 2023. On  
October 30, 2013, Respondent was issued a Mortgage Loan Originator ("MLO") license  
endorsement, National Mortgage Licensing System and Registry ("NMLS") No. 306912.

1 (CRIMINAL CONVICTION)

2 3.

3 On or about March 26, 2019, in the Superior Court of California, County of San  
4 Diego, Case No. C387595DV, Respondent was convicted on a plea of guilty for violation of  
5 Penal Code section 594(a)(b)(2)(A) (vandalism under \$400), a misdemeanor. The imposition of  
6 the sentence was suspended for 3 years, and Respondent was placed on summary probation, on  
7 certain terms and conditions, including, in part, commitment to the Sheriff for 1 day, with 1 day  
8 credit for time served, completion of a 52 week Domestic Violence Recovery Program,  
9 completion of 5 days of a Public Service Program, and a protective order was issued.

10 4.

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

14 5.

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

18 (COSTS OF INVESTIGATION AND ENFORCEMENT)

19 6.

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

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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 RONALD DEE  
4 SCHOONOVER 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.

7  
8 Dated at San Diego, California this 20 day of May, 2020.  
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11 V. Kilpatrick  
12 Veronica Kilpatrick  
13 Supervising Special Investigator  
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24 cc: RONALD DEE SCHOONOVER  
25 Compass California III, Inc.  
26 Finley Properties Corp.  
27 Veronica Kilpatrick  
Sacto.