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FILED

DEC 30 2024

DEPT. OF REAL ESTATE

By *zm* *js*

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of	)	No. H-05848 SD
	)	
ANDREW S LOUIS,	)	<u>ACCUSATION</u>
	)	
Respondent.	)	
	)	

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for cause of Accusation against ANDREW S LOUIS ("Respondent"), also known as "Andrew Steven Louis", 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.

All references to the "Code" are to the California Business and Professions Code and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

LICENSE HISTORY

3.

a. At all times herein mentioned, Respondent was and still is licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and

ACCUSATION

1 Professions Code, as a real estate broker ("REB"), Department of Real Estate¹ ("Department")
2 license ID 01832287.

3 b. The Department originally issued Respondent's REB license on or about July
4 16, 2008.

5 c. Respondent's REB license will expire on July 15, 2028, unless renewed.

6 CAUSE FOR DISCIPLINE
7 (CRIMINAL CONVICTION)

8 4.

9 November 29, 2023; Vehicle Code ("VC") Sections 23153(b) - Felony

10 a. On or about April 20, 2023, in the Superior Court of California, San Diego
11 County, in Case No. **CN440880**, entitled The People of the State of California v. Andrew
12 Steven Louis, a felony complaint was brought against Respondent for violations of (1) VC
13 Section 20001(a) (hit and run with injury), a felony, (2) VC Section 23153(a) (driving under
14 the influence of alcohol causing injury), a felony, and (3) VC Section 23153(b) (driving with a
15 measurable blood alcohol causing injury), a felony.

16 b. On or about November 29, 2023, Respondent pled guilty to and was
17 convicted for violation of VC Section 23153(b) (driving with a measurable blood alcohol
18 causing injury), a felony.

19 c. On or about January 10, 2024, the Court suspended the imposition of sentence
20 and placed Respondent on formal probation for 3 years under certain terms and conditions,
21 including, in part, 365 days jail and payment of fines and fees.

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27 ¹ Between July 1, 2013 and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate
under the Department of Consumer Affairs.

(IN AGGRAVATION)

5.

February 20, 2002; Penal Code ("PC") Sections 245(a) - Misdemeanor

a. On or about August 21, 2001, in the Superior Court of California, San Diego County, in Case No. **CN130379**, entitled The People of the State of California v. Andrew Steven Louis, a felony complaint was brought against Respondent for violations of (1) PC Section 245(a) (assault with deadly weapon/force likely to cause great bodily injury), a felony, (2) PC Section 243(d) (battery with serious bodily injury), a felony, and (3) PC Section 242 (battery), a misdemeanor.

b. On or about February 20, 2002, Respondent was convicted for violation of PC Section 245(a) (assault with deadly weapon/force likely to cause great bodily injury), a misdemeanor.

c. Also on or about February 20, 2002, the Court suspended the imposition of sentence and placed Respondent on summary probation for 3 years under certain terms and conditions, including, in part, 20 hours PSP, 100 hours volunteer work, restitution, and payment of fines and fees.

6.

The crime of which Respondent was convicted, in Paragraph 4, by its facts and circumstances, 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 and 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.

7.

These proceedings are brought under the provisions of Section 10100, Division 4 of the Business and Professions Code of the State of California and Sections 11500 through 11528 of the California Government Code.

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ACCUSATION

1 COSTS

2 8.

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

8 PRAYER

9 WHEREFORE, Complainant prays that a hearing be conducted on the
10 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
11 disciplinary action against all licenses and/or license rights under the Real Estate Law (Part 1 of
12 Division 4 of the California Business and Professions Code) of Respondent ANDREW S
13 LOUIS, for the cost of investigation and enforcement as permitted by law, and for such other
14 and further relief as may be proper under applicable provisions of law.

15 Dated at San Diego, California this 30th
16 day of December, 2024.

17 V Kilpatrick
18 Veronica Kilpatrick
19 Supervising Special Investigator

20 cc: ANDREW S LOUIS
21 Veronica Kilpatrick
22 Sacto.
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ACCUSATION