

1 LAURENCE D. HAVESON, Counsel (SBN 152631)
2 Department of Real Estate
3 320 West 4th Street, Suite 350
4 Los Angeles, California 90013-1105
5 Telephone: (213) 559-5990
6 Direct: (213) 559-5699
7 Fax: (213) 576-6917
8 Email: Laurence.Haveson@dre.ca.gov
9 Attorney for Complainant

FILED
APR 09 2025
DEPT. OF REAL ESTATE
By- [REDACTED]

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of
KRISTOPHER DANIEL SAENZ,
Respondent.

No. H-05876-SD
ACCUSATION

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator for the Department of Real Estate ("Department" or "DRE") of the State of California, for cause of Accusation against KRISTOPHER DANIEL SAENZ ("Respondent"), is informed and alleges in her official capacity as follows:

1. The Complainant, Veronica Kilpatrick, acting in her official capacity as a Supervising Special Investigator, makes this Accusation against Respondent.

2. Respondent presently 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 broker ("REB") (DRE license identification number 01996496).

FIRST CAUSE OF ACCUSATION

(CRIMINAL CONVICTION)

3. Complainant is informed and believes and on such information and belief alleges that on or about April 25, 2022, in the United States District Court for the Central District of California, in the case of *United States of America v. Kristopher Daniel Saenz*, Case No. 18-cr-272-SVW, Respondent was convicted based on his guilty plea for one or more federal crimes, including, but

ACCUSATION

1 not limited to, his guilty plea for violation of Title 18 of the United States Code ("U.S.C."), section
2 371 (conspiracy to commit wire fraud involving deprivation of honest services), a felony. On
3 information and belief, the court sentenced Respondent to three (3) years of formal probation and/or
4 eight (8) months of house arrest, and ordered him to pay restitution in the amount of \$19,860.00.
5 Complainant is ignorant of whether Respondent was indicted, and is ignorant of the actual terms of
6 Respondent's guilty plea, plea agreement, and sentence because, based on information and belief,
7 the court records related to his federal criminal conviction in Case No. 18-cr-272-SVW were filed
8 under seal. Complainant will amend this Accusation to allege the actual terms of Respondent's
9 guilty plea, plea agreement, and sentence if and when such terms are ascertained.

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

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

16 SECOND CAUSE OF ACCUSATION

17 (FAILURE TO REPORT FELONY CHARGE AND CONVICTION)

18 6. The Complainant realleges and incorporates by reference all of the allegations
19 contained in paragraphs 1 through 5 above, with the same force and effect as though fully set forth
20 herein.

21 7. Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, "The
22 bringing of a criminal complaint, information, or indictment charging a felony against the licensee,"
23 and "The conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest,
24 of any felony or misdemeanor" to the Department within thirty (30) days of the of the date of the
25 bringing of the indictment or the charging of a felony, and of the conviction.

26 8. Complainant is informed and believes and thereon alleges that Respondent failed to
27 report in writing to the Department his conviction described in Paragraph 3 above, within thirty (30)
28 days of the conviction. Complainant is ignorant of the actual date of Respondent's conviction

1 because, based on information and belief, the court records related to his federal criminal conviction
2 in Case No. 18-cr-272-SVW were filed under seal. Complainant will amend this Accusation to
3 allege the date of Respondent's conviction if and when ascertained

4 9. Complainant is informed and believes and thereon alleges Respondent's failure to
5 timely report the bringing of the felony complaint and his conviction violates Code section 10186.2
6 and constitutes cause under Code sections 10186.2 and 10177(d) for the suspension or revocation
7 of the license and license rights of Respondent under the Real Estate Law.

8 COSTS

9 (COSTS OF INVESTIGATION AND ENFORCEMENT)

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

15 WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this
16 Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against
17 all the licenses and license rights of Respondent KRISTOPHER DANIEL SAENZ under the Real
18 Estate Law, for the costs of investigation and enforcement as permitted by law, and for such other
19 and further relief as may be proper under other applicable provisions of law.

20
21 Dated 04/08/2025, at San Diego, California.

22
23 
24 _____
25 Veronica Kilpatrick
Supervising Special Investigator

26 cc: KRISTOPHER DANIEL SAENZ
27 Veronica Kilpatrick
28 Sacto.