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FILED

FEB 03 2026

DEPT. OF REAL ESTATE

By 

7
8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

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11 In the Matter of the Application of) No. H-05927 SD
12)
13 SAMUEL JOSEPH ELLIS,) STATEMENT OF ISSUES
14)
15 Respondent.)
16)

17 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
18 State of California, acting in her official capacity, for Statement of Issues against SAMUEL
19 JOSEPH ELLIS ("Respondent") alleges as follows:

20 (APPLICATION)

21 1.

22 On or about July 18, 2025, Respondent made application to the Department of
23 Real Estate of the State of California for a real estate salesperson license.

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(FELONY CONVICTIONS)

2.

On or about June 9, 2016, in the Circuit Court for Montgomery County, State of Maryland, case no. 128333C, Respondent was convicted of violating two (2) counts of Maryland Criminal Law Code section 2-209 (negligent manslaughter by motor vehicle), both felonies. Respondent was sentenced, in part, to serve ten (10) years of prison with eight (8) years suspended, five (5) supervised probation, and 500 hours of community service. Said crimes bear a substantial relationship to the qualifications, functions, or duties of a real estate licensee under Section 2910, Title 10, Chapter 6, California Code of Regulations.

3.

The crimes of which Respondent was convicted as alleged above in Paragraph 2, above, constitute cause for denial of Respondent's application for a real estate license under California Business and Professions Code sections 475(a)(2), 480(a), and 10177(b).

4.

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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1 WHEREFORE, the Complainant prays that the above-entitled matter be set for
2 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
3 authorize the issuance of, and deny the issuance of, a real estate salesperson license to
4 Respondent SAMUEL JOSEPH ELLIS and for such other and further relief as may be proper
5 under other applicable provisions of law.

6 Dated at San Diego, California: January 2, 2026.

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9 _____
10 Veronica Kilpatrick
11 Supervising Special Investigator

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25 cc: SAMUEL JOSEPH ELLIS
26 Travel + Leisure Resort Development, Inc.
27 Veronica Kilpatrick
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