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DEPARTMENT OF REAL ESTATE

By By dew

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BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of

RONALD P. CASTRO, JR.,

Respondent.

No. H-7397 SAC

ACCUSATION

The Complainant, HEATHER NISHIMURA, acting in her official capacity as a  
Supervising Special Investigator of the State of California, for cause of Accusation against  
RONALD PATRICK CASTRO, JR. ("Respondent"), is informed and alleges as follows:

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At all times herein mentioned, Respondent was and is presently licensed and/or  
has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and  
Professions Code ("the Code") by the Department of Real Estate ("the Department") as a real  
estate salesperson.

CRIMINAL CONVICTION

2

On or about September 7, 2023, in the Superior Court of the State of California,  
County of Placer, Case No. 62-188471, Respondent was convicted of violating §20001(a) (hit  
and run with injury or death) of the California Vehicle Code, a misdemeanor and crime which

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1 bears a substantial relationship under Section 2910, Title 10, of the California Code of  
2 Regulations ("Regulations"), to the qualifications, functions, or duties of a real estate licensee.

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4 The facts alleged in Paragraph 3 above, constitute cause under §490 (conviction  
5 of substantially related crime), §10177(b) (conviction of substantially related crime), and  
6 §10177(j) (fraud or dishonest dealing) of the Code for suspension or revocation of Respondent's  
7 license and license rights under the Real Estate Law.

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9 FAILURE TO NOTIFY THE DEPARTMENT

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11 Pursuant to §10186.2 of the Code, a real estate licensee shall report to the  
12 Department, in writing within 30 days of the date of the bringing of a criminal complaint,  
13 indictment or the charging of a felony, the conviction of the licensee of a misdemeanor and/or  
14 felony conviction, and/or any disciplinary action taken by another licensing entity or authority of  
15 this state or of another state or an agency of the federal government.

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17 A diligent search was made of the records of the Department, relating to  
18 Respondent's real estate salesperson license ID 01359679. As a result of said search, no written  
19 record was discovered of Respondent notifying the Department within 30 days of the conviction  
20 alleged above in Paragraph 3.

21 6

22 The facts alleged in Paragraphs 5 and 6 above constitute cause under §10177(d)  
23 (willful disregard or violation of real estate law) and §10186.2 of the Code for suspension or  
24 revocation of all licenses and license rights of Respondent under Part 1 of Division 4 of the  
25 Code.

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COST RECOVERY

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§10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, 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.

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all licenses and license rights of Respondent under the Code, for the reasonable costs of investigation and enforcement as permitted by law, including agency attorney's fees, and for such other and further relief as may be proper under provisions of law.

  
HEATHER NISHIMURA  
Supervising Special Investigator

Dated at Sacramento, California  
this 6<sup>th</sup> day of Nov. 2024.

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DISCOVERY DEMAND

Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the Department hereby makes demand for discovery pursuant to the guidelines set forth in the *Administrative Procedure Act*. Failure to provide Discovery to the Department may result in the exclusion of witnesses and documents at the hearing or other sanctions that the Office of Administrative Hearings deems appropriate.