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FILED
APR 16 2025
DEPARTMENT OF REAL ESTATE
By J. Taggart

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)

12 LYNEL CHARLES FORD,)

13 Respondent.)
14

No. H-7443-SAC

ACCUSATION

15 The Complainant, HEATHER NISHIMURA, a Supervising Special Investigator
16 of the State of California, for cause of Accusation against LYNEL CHARLES FORD
17 ("Respondent"), is informed and alleges as follows:

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19 Complainant makes this Accusation against Respondent in their official capacity.

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21 Respondent is presently licensed and/or has license rights under the Real Estate
22 Law, Part 1 of Division 4 of the California Business and Professions Code (the "Code") by the
23 Department of Real Estate (the "Department") as a real estate broker.

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25 On or about May 3, 2024, in the Superior Court of the State of California, County
26 of Sacramento, Case No. 23FE021145, Respondent was convicted of violating Section 550(b)(1)
27 (submit fraudulent insurance claims) of the California Penal Code, a misdemeanor and crime

1 which bears a substantial relationship to the qualifications, functions, or duties of a real estate
2 licensee under Section 2910, Title 10, Chapter 6, California Code of Regulations.

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4 The facts alleged in Paragraph 3 above constitute cause under Sections 490
5 (conviction of crime), 10177(b) (conviction of crime), and 10177(j) (engaged in conduct that
6 constitutes fraud or dishonest dealing) of the Code for the suspension or revocation of
7 Respondent's license(s) under real estate law.

8 MATTERS IN AGGRAVATION

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10 On or about November 13, 2002, in the Superior Court of the State of California,
11 County of Yolo, Case No. 020006758002, Respondent was convicted of violating Sections
12 23152(a) (DUI) and 23103(a) (reckless driving – highway) of the California Vehicle Code, both
13 misdemeanors.

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15 Section 10106 of the Code provides, in pertinent part, that in any order issued
16 in resolution of a disciplinary proceeding before the Department, the commissioner may request
17 the administrative law judge to direct a licensee found to have committed a violation of this part
18 to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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

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3 HEATHER NISHIMURA
4 Supervising Special Investigator
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6 Dated at Sacramento, California

7 this 16th day of April, 2025.
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10 DISCOVERY DEMAND

11 The Department of Real Estate hereby requests discovery pursuant to Section
12 11507.6 of the California Government Code. Failure to provide discovery to the Department may
13 result in the exclusion of witnesses and/or documents at the hearing, and other sanctions as the
14 Administrative Law Judge deems appropriate.
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