

FILED

MAR 20 2015

BUREAU OF REAL ESTATE

By S. Blech

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9 BEFORE THE BUREAU OF REAL ESTATE

10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of

13 RONALD KIRK BRADY,

14 Respondent.

No. H-11829 SF

ACCUSATION

15
16 The Complainant, ROBIN S. TANNER, in her official capacity as a Deputy Real
17 Estate Commissioner of the State of California, for cause of Accusation against Respondent
18 RONALD KIRK BRADY ("Respondent"), is informed and alleges as follows:

19 1

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

23 2

24 On or about June 18, 2012, in the Criminal District Court of Orleans Parish, State
25 of Louisiana, Case No. 511-412, Respondent was convicted upon a plea of guilty, to violating
26 Section RS 40 966(a)(2) (willful and unlawful possession of marijuana with intent to distribute),

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

3 3

4 Pursuant to Section 10186.2 of the Code, effective January 1, 2012, a licensee
5 shall report in writing to the Bureau the bringing of an indictment or information charging a
6 felony against the licensee, and the conviction of a licensee, including any verdict of guilty, or
7 plea of guilty or no contest, of any felony or misdemeanor, within thirty (30) days of the date of
8 the filing of the indictment or information, and conviction, verdict or plea. Respondent failed to
9 report the felony conviction identified in paragraph 2, above, in writing to the Bureau within the
10 time required by Section 10186.2 of the Code. Such failure constitutes grounds for the
11 suspension or revocation of all licenses and license rights of Respondent pursuant to Section
12 10177(d) (willful disregard or violation of the Real Estate Law) of the Code, in conjunction
13 with Section 10186.2 of the Code.

14 4

15 Respondent's conviction identified in paragraph 2, above, constitutes cause
16 under Sections 490 (Conviction of Crime) and 10177(b) (Conviction of Crime Substantially
17 Related to Qualifications, Functions or Duties of Real Estate Licensee) of the Code for the
18 suspension or revocation of all licenses and license rights of Respondent under the Real Estate
19 Law.

20 Cost Recovery

21 5

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

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1 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
2 of this Accusation and that upon proof thereof, a decision be rendered revoking all licenses and
3 license rights of Respondent under the Real Estate Law (Part 1 of Division 4 of the Business and
4 Professions Code), for the cost of investigation and enforcement as permitted by law, and for
5 such other and further relief as may be proper under other provisions of law.

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7 
8 ROBIN S. TANNER
Deputy Real Estate Commissioner

9 Dated at Oakland, California,
10 this 18th day of March, 2015.

11
12 DISCOVERY DEMAND

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