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FILED

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DEPARTMENT OF REAL ESTATE
BY: 

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8
9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 * * *

12	In the Matter of the Accusation of)	No. H- 38466 LA
13	FEDERAL HOME LOANS CORPORATION,)	<u>A C C U S A T I O N</u>
14	Respondent.)	
15	_____)	

16 The Complainant, Veronica Kilpatrick, a Deputy Real
17 Estate Commissioner of the State of California, for cause of
18 Accusation against FEDERAL HOME LOANS CORPORATION (hereafter
19 "Respondent") is informed and alleges as follows:

20 1.

21 The Complainant, Veronica Kilpatrick, a Deputy Real
22 Estate Commissioner of the State of California, makes this
23 Accusation in her official capacity.

24 2.

25 Respondent is presently licensed and/or has license
26 rights under the Real Estate Law (Part 1 of Division 4 of the
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1 Business and Professions Code, hereinafter "Code"), as a
2 corporate real estate broker.

3 3.

4 On or about May 7, 2012, the final judgment of the
5 Arizona Superior Court, Pima County, Case No. C20094384, was
6 entered against Respondent based on the grounds of fraud,
7 misrepresentation, or deceit with reference to a transaction for
8 which a real estate license is required. Respondent was found to
9 have committed fraud by clear and convincing evidence.

10 4.

11 The facts set forth in Paragraph 3, above, constitute
12 cause under Section 10177.5 of the Code for the suspension or
13 revocation of all licenses and license rights of Respondent
14 under the Real Estate Law.

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1 WHEREFORE, Complainant prays that a hearing be
2 conducted on the allegations of this Accusation and that upon
3 proof thereof, a decision be rendered imposing disciplinary
4 action against all licenses and/or license rights of Respondent
5 FEDERAL HOME LOANS CORPORATION under the Real Estate Law, for
6 the cost of investigation and enforcement as permitted by Code
7 Section 10106, and for such other and further relief as may be
8 proper under applicable provisions of law.

9 this 3 day of October, 2012.

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14 Veronica Kilpatrick
15 Deputy Real Estate Commissioner

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20 cc: FEDERAL HOME LOANS CORPORATION
21 Veronica Kilpatrick
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