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DEPARTMENT OF REAL ESTATE

BY: *[Signature]*

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BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of	)	No. H- 38612 LA
	)	
BROOKE BAILEY,	)	<u>A C C U S A T I O N</u>
	)	
Respondent.	)	
	)	

The Complainant, Veronica Kilpatrick, a Deputy Real Estate Commissioner of the State of California for cause of Accusation against BROOKE BAILEY, a.k.a. Brooke Siliciliano or Brooke Siciliano Smith ("Respondent") alleges as follows:

1.

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

2.

Respondent 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 as a real estate broker.

1 3.

2 On or about March 2, 2012, in the Superior Court of
3 California, Riverside County, in Case No. SWF1100515,
4 Respondent pled guilty and was convicted for violation of
5 California Penal Code Section 484I(A) (incomplete access card
6 without permission or consent of the issuer), a misdemeanor.
7 Respondent pled guilty and was sentenced to 36 months
8 probation, one day in jail, pay victim restitution, and stay
9 away from the victim.

10 4.

11 This conviction, by its facts and circumstances,
12 bears a substantial relationship under Section 2910, Title 10,
13 Chapter 6, California Code of Regulations to the
14 qualifications, functions or duties of a real estate licensee.

15 5.

16 The crime of which Respondent was convicted
17 constitutes cause under California Business and Professions
18 Code Sections 490 and 10177(b) for the suspension or revocation
19 of the license and license rights of Respondent under the Real
20 Estate Law.

21 6.

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

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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 under the
5 Real Estate Law (Part 1 of Division 4 of the California
6 Business and Professions Code) of Respondent BROOKE BAILEY, for
7 the cost of investigation and enforcement as permitted by law,
8 and for such other and further relief as may be proper under
9 applicable provisions of law.

10 Dated at Los Angeles, California

11 this 29th day of November, 2012.

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14 V. Kilpatrick
15 Veronica Kilpatrick
16 Deputy Real Estate Commissioner
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21 cc: BROOKE BAILEY
22 Veronica Kilpatrick
23 Sacto.
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