

FILED

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BUREAU OF REAL ESTATE

By *M. Salorio*

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BEFORE THE BUREAU OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of)	No. H40558-LA
)	
LLOYD DOUGLAS BROWN,)	<u>ACCUSATION</u>
)	
Respondent.)	
)	

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for cause of Accusation against LLOYD DOUGLAS BROWN ("Respondent"), is informed and alleges as follows:

1.

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator 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 ("Code"), as a real estate broker, Bureau of Real Estate License ID No. 01076465. Respondent's real estate license is due to expire on February 9, 2020.

1 FIRST CAUSE FOR ACCUSATION

2 (LICENSE DISCIPLINE BY ANOTHER AGENCY)

3 3.

4 On or about May 18, 2016, the State Bar Court in the Supreme Court of
5 California, in Case No. S232824, ordered that Respondent, State Bar No. 44908, be disbarred
6 from the practice of law in California and that his name be stricken from the roll of attorneys.
7 As more fully set forth in the Opinion and Order filed on January 5, 2016 before the Review
8 Department of the State Bar Court, in Case No. 12-O-16760, Respondent breached his fiduciary
9 duty as an escrow holder, and thereby committed acts involving moral turpitude, dishonesty or
10 corruption in violation of Business and Professions Code section 6106.

11 4.

12 The prior license action against Respondent, as alleged in Paragraph 3 above,
13 constitutes cause for the suspension or revocation of the license or license rights of Respondent
14 under Business and Professions Code section 10177(f).

15 5.

16 These proceedings are brought under the provisions of Section 10100, Division
17 4 of the Business and Professions Code of the State of California and California Government
18 Code sections 11500 through 11528.

19 SECOND CAUSE FOR ACCUSATION

20 (FAILURE TO REPORT DISCIPLINE BY ANOTHER AGENCY)

21 6.

22 Pursuant to Business and Professions Code section 10186.2 a licensee shall
23 report, in writing, "any disciplinary action taken by another licensing entity or authority of this
24 state or of another state or an agency of the federal government" to the Bureau within 30 days
25 of the disciplinary action. Respondent failed to report in writing to the Bureau his disbarment
26 with the State Bar of California described in Paragraph 3 above, within 30 days of the
27 disciplinary action.

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7.

Respondent's failure to timely report his prior license discipline constitutes cause under Section 10186.2 of the Code for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

COST RECOVERY

(INVESTIGATION AND ENFORCEMENT COSTS)

8.

Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Bureau of Real Estate, 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 the licenses and license rights of Respondent LLOYD DOUGLAS BROWN under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code) for the costs of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at San Diego, California this 17th day of January, 2017



Veronica Kilpatrick
Supervising Special Investigator

cc: LLOYD DOUGLAS BROWN
Veronica Kilpatrick
Sacto.