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FILED

MAY - 2 2017

BUREAU OF REAL ESTATE

By



9 BEFORE THE BUREAU OF REAL ESTATE
10 DEPARTMENT OF CONSUMER AFFAIRS
11 STATE OF CALIFORNIA

12 * * *

13 In the Matter of the Accusation of) No. H-40623 LA
14)
15 HALEY ANN FARNAM,) ACCUSATION
16)
17 Respondent.)
18)

19 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
20 State of California, for cause of Accusation against HALEY ANN FARNAM, ("Respondent")
21 alleges as follows:

22 1.

23 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
24 State of California, makes this Accusation in her official capacity.

25 2.

26 Respondent presently has license rights under the Real Estate Law, Part 1 of
27 Division 4 of the California Business and Professions Code ("Code"), as a real estate broker
(License ID 01323200). Respondent's license expires on April 6, 2018, unless renewed.

ACCUSATION OF HALEY ANN FARNAM

1 FIRST CAUSE OF ACCUSATION

2 (CRIMINAL CONVICTION)

3 3.

4 On or about October 5, 2016, in the Superior Court of California, County of
5 Riverside, Case No. SWF1600641, Respondent was convicted on a plea of guilty for violation
6 of Vehicle Code section 20002(a) (hit and run involving property damage), a misdemeanor.
7 Respondent was placed on summary probation for 36 months and ordered to serve 90 days in
8 county jail, with credit for time served.

9 4.

10 The conviction, as described in Paragraph 3 above, bears a substantial
11 relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the
12 qualifications, functions or duties of a real estate licensee.

13 5.

14 The crime of which Respondent was convicted, as described in Paragraph 3
15 above, constitutes cause under Sections 490 and 10177(b) of the Code for the suspension or
16 revocation of the license and license rights of Respondent under the Real Estate Law.

17 (IN AGGRAVATION)

18 6.

19 In aggravation, on or about April 16, 2014, in the Superior Court of California,
20 County of Riverside, Case No. SWF1400026, Respondent was convicted on a plea of guilty for
21 violation of Penal Code section 415(2) (disturbing the peace), a misdemeanor. Respondent was
22 placed on summary probation for 36 months.

23 7.

24 In aggravation, on or about February 17, 2005, in the Superior Court of
25 California, County of Riverside, Case No. SWM033019, Respondent was convicted for
26 violation of Vehicle Code section 23152(b) (driving a vehicle while having 0.08% or more of
27

1 blood alcohol content), a misdemeanor. Respondent was placed on summary probation for 3
2 years. Respondent's driver license was suspended for 3 months.

3 SECOND CAUSE OF ACCUSATION
4 (FAILURE TO REPORT CONVICTION)

5 8.

6 Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, "the
7 conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any
8 felony or misdemeanor" to the Bureau of Real Estate ("Bureau") within thirty (30) days of the
9 conviction. Respondent failed to report in writing to the Bureau the conviction described in
10 Paragraphs 3 above, within thirty (30) days of the conviction date.

11 9.

12 Respondent's failure to timely report the conviction constitutes cause under
13 Section 10186.2 of the Code for the suspension or revocation of the license and license rights of
14 Respondent under the Real Estate Law.

15 COSTS
16 (COSTS OF INVESTIGATION AND ENFORCEMENT)

17 10.

18 California Business and Professions Code Section 10106, provides, in pertinent
19 part, that in any order issued in resolution of a disciplinary proceeding before the Bureau of
20 Real Estate, the Commissioner may request the administrative law judge to direct a licensee
21 found to have committed a violation of this part to pay a sum not to exceed the reasonable costs
22 of the investigation and enforcement of the case.

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1 WHEREFORE, Complainant prays that a hearing be conducted on the
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3 disciplinary action against all the licenses and license rights of Respondent HALEY ANN
4 FARNAM under the Real Estate Law, for the costs of investigation and enforcement as
5 permitted by law, and for such other and further relief as may be proper under other applicable
6 provisions of law.

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8 Dated at San Diego, California this 24th day of April, 2017
9

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11 V. Kilpatrick
12 Veronica Kilpatrick
13 Supervising Special Investigator
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25 cc: HALEY ANN FARNAM
26 Veronica Kilpatrick
27 Sacto.