

FILED

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BUREAU OF REAL ESTATE

By ASelous

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BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

In the Matter of the Accusation of) No. H- 40706 LA
)
ANDRE DIMITRI HURST,) A C C U S A T I O N
)
Respondent.)
)

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

1.

The Complainant, Veronica Kilpatrick, acting in her official capacity as a
Supervising Special Investigator of the State of California, makes this Accusation against
ANDRE DIMITRI HURST.

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Accusation of Andre Dimitri Hurst

2.

Respondent presently 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. On August 1, 2016, Respondent's license expired. Pursuant to Code Section 10201, Respondent retains renewal rights for two years. The Bureau of Real Estate holds jurisdiction over the lapsed license, pursuant to Code Section 10103.

3.

On or about September 22, 2016, Respondent pled guilty and was convicted in the Superior Court of California, County of San Diego, Case No. SCN357096, for violation of California Penal Code Section 459 with enhancement under Penal Code Section 460(a) (Burglary First Degree), a felony, and Penal Code Section 647(j)(3)(a) (Disorderly Conduct Secretly Filming A Person), a misdemeanor. Respondent was placed on three years of formal probation, and ordered to serve 120 days in jail stayed and pay restitution, fines and fees.

4.

The convictions described in Paragraph 3 bear a substantial relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real estate licensee.

5.

The crimes of which Respondent was convicted, as described in Paragraph 3 above, constitute cause under Sections 490 and 10177(b)(1) of the Code for the suspension or revocation of all the licenses and license rights of Respondent under the Real Estate Law.

6.

Code Section 10106 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.

Accusation of Andre Dimitri Hurst

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 ANDRE DIMITRI
4 HURST under the Real Estate Law, for the cost of investigation and enforcement as permitted
5 by law, and for such other and further relief as may be proper under other applicable provisions
6 of law.

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8 Dated at San Diego, California

9 this 29th day of June, 2017

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11 
12 Veronica Kilpatrick
13 Supervising Special Investigator

14 cc: ANDRE DIMITRI HURST
15 Veronica Kilpatrick
16 Sacto.