

FILED

AUG - 1 2017

BUREAU OF REAL ESTATE

By Al Selous

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BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)	No. H-40731 LA
)	
FRANCISCO RAMIREZ JR.,)	<u>A C C U S A T I O N</u>
)	
Respondent.)	
)	

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for cause of Accusation against FRANCISCO RAMIREZ JR ("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 FRANCISCO RAMIREZ JR.

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.

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Accusation of Francisco Ramirez Jr

1 3.

2 On or about August 5, 2016, Respondent pled nolo contendere and was
3 convicted in the Superior Court of California, County of Los Angeles, Case No. BA445823, for
4 violation of California Penal Code Section 664-261.5 (Attempted Unlawful Sexual Intercourse
5 With A Minor), a felony. Respondent was placed on five years of formal probation, and
6 ordered to serve 18 months in prison suspended and pay fines and fees. Additionally,
7 Respondent was ordered to complete 45 days of community labor and an approved 52-week sex
8 offender program.

9 4.

10 The conviction described in Paragraph 3 bears a substantial relationship under
11 Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications,
12 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)(1) of the Code for the suspension or
16 revocation of all the licenses and license rights of Respondent under the Real Estate Law.

17 6.

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

7
8 Dated at San Diego, California

9 this 21 day of July, 2017

10
11 V. Kilpatrick
12 Veronica Kilpatrick
13 Supervising Special Investigator

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15 cc: FRANCISCO RAMIREZ JR
16 Veronica Kilpatrick
17 Sacto.
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