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FILED

OCT 30 2018

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By *CE Selous*

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BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation against) No. H-41199 LA
)
SUZANNE ELLIS,) ACCUSATION
)
Respondent.)
_____)

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for cause of Accusation against SUZANNE ELLIS ("Respondent"), 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 salesperson.

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ACCUSATION AGAINST SUZANNE ELLIS

(CRIMINAL CONVICTIONS)

3.

On or about April 21, 2017, in the Superior Court of California, County of Riverside, Case No. SWF1600246, Respondent was convicted of violating Unemployment Insurance Code section 2117 (failure to file return/report information to EDD), a misdemeanor. Respondent was placed on probation for three (3) years and was committed to the custody of the Riverside County Sheriff for thirty (30) days. Respondent was also ordered to pay fees and fines.

4.

The conviction described in Paragraph 3 bears 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 conviction described in Paragraph 3 constitutes cause under sections 490, subdivision (a), and 10177, subdivisions (b) and (j), of the Code for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

(FAILURE TO REPORT CONVICTION)

6.

Pursuant to section 10186.2 of the Code, a licensee shall report, in writing, "the conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any felony or misdemeanor" to the Department within thirty (30) days of the conviction. Respondent failed to report in writing to the Department the conviction described in Paragraph 3 above, within thirty (30) days of the conviction date.

7.

Respondent's failure to timely report the conviction described in Paragraph 3 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.

(INVESTIGATION AND ENFORCEMENT COSTS)

8.

California Business and Professions Code section 10106, provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, 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 SUZANNE ELLIS under the Real Estate Law for the cost 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 26 day of October, 2018


Veronica Kilpatrick
Supervising Special Investigator

cc: SUZANNE ELLIS
Veronica Kilpatrick
Sacto.