

FILED

OCT 30 2018

DEPT. OF REAL ESTATE
By *al Selow*

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8 **BEFORE THE DEPARTMENT OF REAL ESTATE**
9 **STATE OF CALIFORNIA**

10 * * *

11 In the Matter of the Accusation against) No. H-41200 LA
12)
13 RONALD DEAN ELLIS,) ACCUSATION
14)
15 Respondent.)

16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
17 State of California, for cause of Accusation against RONALD DEAN ELLIS ("Respondent"),
18 alleges as follows:

19 1.

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

22 2.

23 Respondent is presently licensed and/or has license rights under the Real Estate
24 Law, Part 1 of Division 4 of the California Business and Professions Code ("Code") as a real
25 estate broker.

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1 (CRIMINAL CONVICTIONS)

2 3.

3 On or about April 21, 2017, in the Superior Court of California, County of
4 Riverside, Case No. SWF1600246, Respondent was convicted of two counts of violating Labor
5 Code section 3700.5, subdivision (a) (failure to secure the payment of worker's compensation
6 as required), a misdemeanor, and one count of violating Unemployment Insurance Code section
7 2117 (failure to file return/report information to EDD), a misdemeanor. Respondent was placed
8 on probation for three (3) years and was committed to the custody of the Riverside County
9 Sheriff for ninety (90) days. Respondent was also ordered to pay victim restitution in the
10 amount of \$59,460.32, fees, and fines.

11 4.

12 The convictions described in Paragraph 3 bear a substantial relationship under
13 section 2910, title 10, chapter 6, California Code of Regulations, to the qualifications,
14 functions, or duties of a real estate licensee.

15 5.

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

19 (FAILURE TO REPORT CONVICTIONS)

20 6.

21 Pursuant to section 10186.2 of the Code, a licensee shall report, in writing, "the
22 conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any
23 felony or misdemeanor" to the Department within thirty (30) days of the conviction.
24 Respondent failed to report in writing to the Department the convictions described in Paragraph
25 3 above, within thirty (30) days of the conviction date.

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7.

Respondent's failure to timely report the convictions 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 RONALD DEAN 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

V. Kilpatrick
Veronica Kilpatrick
Supervising Special Investigator

cc: RONALD DEAN ELLIS
Veronica Kilpatrick
Sacto.