

FILED

JUN 26 2019

DEPT. OF REAL ESTATE  
By Kevin H. Sun

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BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of	)	No. H-41393 LA
	)	
ERICA DALILA HERRERA,	)	<u>ACCUSATION</u>
	)	
	)	
Respondent.	)	
	)	

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for cause of Accusation against ERICA DALILA HERRERA ("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.

All references to the "Code" are to the California Business and Professions Code and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

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ACCUSATION

1 LICENSE HISTORY

2 3.

3 a. Respondent is presently licensed and/or has license rights under the Real  
4 Estate Law, Part 1 of Division 4 of the California Business and Professions Code, as a real  
5 estate salesperson ("RES"), Department of Real Estate<sup>1</sup> ("Department") license ID 01387678.

6 b. The Department originally issued Respondent's RES license on or about  
7 August 19, 2003.

8 c. Respondent's license is scheduled to expire on August 18, 2019. Pursuant to  
9 Code Section 10201, Respondent retains renewal rights for two years.

10 CAUSE FOR DISCIPLINE

11 (CRIMINAL CONVICTION)

12 4.

13 September 27, 2017; Penal Code Section 245(a)(4) - Felony

14 a. On September 27, 2017, in the Superior Court of California, County of San  
15 Bernardino, in Case No. **SCS293149**, The People of the State of California vs. Erica Herrera,  
16 Respondent pled guilty to and was convicted for violation of Penal Code Section 245(a)(4)  
17 (assault with force likely to produce great bodily injury), a felony.

18 b. On January 29, 2018, Respondent was sentenced to 3 years formal probation,  
19 pay court fees and fines, and 180 days jail.

20 5.

21 The crime of which Respondent was convicted, by its facts and circumstances,  
22 bears a substantial relationship under Section 2910, Title 10, Chapter 6, California Code of  
23 Regulations to the qualifications, functions or duties of a real estate licensee and constitutes  
24 cause under **Code Sections 490 and 10177(b)** for the suspension or revocation of the license  
25 and license rights of Respondent under the Real Estate Law.

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27 <sup>1</sup> Between July 1, 2013 and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate  
under the Department of Consumer Affairs.

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