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FILED
JUL 20 2022
DEPT. OF REAL ESTATE
By *@O Selau*

9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-42386 LA
13)
14 TODD ELLIOTT CAMARENA,) ACCUSATION
15)
16 Respondent.)
17 _____)

18 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
19 State of California, for cause of Accusation against TODD ELLIOTT CAMARENA
20 (“Respondent”), also known as Todd Camarena, Todd E. Camarena, Todd Elliot Camarena,
21 alleges as follows:

22 1.

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

25 2.

26 Respondent presently has license rights under the Real Estate Law, Part 1 of
27 Division 4 of the California Business and Professions Code (“Code”), as a real estate
salesperson (License ID 02030709). Respondent’s license expiration date was April 3, 2021;
however, pursuant to Governor Newsom’s Executive Order No. N-83-20, Respondent’s license

ACCUSATION

1 expiration date was extended until June 30, 2021. Respondent's license expired on June 30,
2 2021. The Department of Real Estate retains jurisdiction over the lapsed license pursuant to
3 Section 10103 of the Code.

4 FIRST CAUSE OF ACCUSATION
5 (CRIMINAL CONVICTIONS)

6 3.

7 On or about November 2, 2020, in the Superior Court of California, County of
8 Riverside, Case No. RIF1902258, Respondent was convicted on a plea of guilty for violation of
9 Penal Code section 594(a) (vandalism), a misdemeanor. Respondent was placed on summary
10 probation for thirty-six (36) months on certain terms and conditions, including, in part,
11 commitment to the custody of the Riverside County Sheriff for sixty (60) days, with credit for
12 time served of two (2) actual days, and two (2) days pursuant to Penal Code section 4019, for a
13 total of four (4) days, and with fifty-six (56) days to be served in the Work Release Program,
14 attending one (1) AA meeting per week for the period of probation, payment of victim
15 restitution in an amount to be determined, and payment of fines and fees. The County jail
16 sentence was ordered to run concurrent with Case No. RIM1900464.

17 4.

18 On or about November 2, 2020, in the Superior Court of California, County of
19 Riverside, Case No. RIM1900464, Respondent was convicted on a plea of guilty for violation
20 of Penal Code section 243(e)(1) (battery on a spouse/person whom defendant is cohabitating
21 with), a misdemeanor. Respondent was placed on summary probation for thirty-six (36) months
22 on certain terms and conditions, including, in part, commitment to the custody of the Riverside
23 County Sheriff for sixty (60) days, with credit for time served of two (2) actual days, and two
24 (2) days pursuant to Penal Code section 4019, for a total of four (4) days, and with fifty-six (56)
25 days to be served in the Work Release Program, completion of a fifty-two (52) week Domestic
26 Violence Program, having no negative contact with a protected party, and attending one (1) AA
27 meeting per week for the period of probation, payment of victim restitution in an amount to be

ACCUSATION

1 determined, and payment of fines and fees. The County jail sentence was ordered to run
2 concurrent with Case No. RIF1902258.

3 5.

4 In aggravation, on or about January 28, 2005, in the Superior Court of
5 California, County of Riverside, Case No. RIM463923, Respondent was convicted on a plea of
6 guilty for violation of Vehicle Code section 23152(a) (driving under the influence), and
7 violation of Vehicle Code section 23152(b) (driving under the influence with a blood alcohol
8 content of 0.08 percent or higher), both misdemeanors. Respondent was placed on summary
9 probation for thirty-six (36) months on certain terms and conditions, including, in part,
10 commitment to the custody of the Riverside Sheriff's Office for six (6) days, with credit for
11 time served of one (1) day, and commitment to be served in the Sheriff Work Program,
12 completion of a First Offender DUI program, suspension of license for twelve (12) months, and
13 payment of fines and fees.

14 SECOND CAUSE OF ACCUSATION
15 (FAILURE TO REPORT CONVICTIONS)

16 6.

17 Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, "the
18 conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any
19 felony or misdemeanor" to the Department of Real Estate ("Department") within thirty (30)
20 days of the conviction. Respondent failed to report in writing to the Department the convictions
21 described in Paragraphs 3 and 4 above, within thirty (30) days of the conviction date.

22 7.

23 Respondent's failure to timely report the convictions constitutes cause under
24 Section 10186.2 of the Code for the suspension or revocation of the license and license rights of
25 Respondent under the Real Estate Law.

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ACCUSATION

(COSTS OF INVESTIGATION AND ENFORCEMENT)

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 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.

* * *

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 TODD ELLIOTT CAMARENA under the Real Estate Law, for the costs 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 19 day of July, 2022.

Veronica Kilpatrick

Veronica Kilpatrick
Supervising Special Investigator

cc: TODD ELLIOTT CAMARENA
Veronica Kilpatrick
Sacto.

ACCUSATION