

FILED

SEP 15 2022

DEPT. OF REAL ESTATE
By at Delacruz

ANDREA BENTLER, Counsel (SBN 319369)
Department of Real Estate
320 West 4th Street, Suite 350
Los Angeles, California 90013-1105
Telephone: (213) 576-6982
Direct: (213) 576-6905
Fax: (213) 576-6917
Attorney for Complainant

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of) No. H-42388 LA
)
ALBERT MAGBAG DELA CRUZ,) FIRST AMENDED
) ACCUSATION
Respondent.)
_____)

This Accusation amends the Accusation filed on August 2, 2022. The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for cause of Accusation against ALBERT MAGBAG DELA CRUZ, also known as Albert Magbag Delacruz ("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 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 salesperson (License ID 01373531). Respondent's license is scheduled to expire on June 21, 2024, unless renewed. Respondent has an approved individual MLO endorsement, NMLS No.

ACCUSATION

1 01373531. The MLO license endorsement is set to expire on December 31, 2022, unless
2 renewed.

3 FIRST CAUSE OF ACCUSATION

4 (CRIMINAL CONVICTIONS)

5 3.

6 On or about November 8, 2021, in the Superior Court of California, County of
7 Orange, Case No. 21WF0300, Respondent was convicted on a plea of guilty for violation of
8 Penal Code section 594(a)/(b)(1) (vandalism – damage \$10,000 or more), violation of Penal
9 Code section 22210 (possession of a prohibited weapon), and violation of Penal Code section
10 594 (a)/(b)(1) (vandalism – damage \$400 or more), all misdemeanors. The imposition of the
11 sentence was suspended. Respondent was placed on one (1) year of informal probation, on
12 certain terms and conditions, including, in part, completion of two hundred (200) hours of
13 community service, payment of victim restitution in an amount to be determined, and payment
14 of fees and fines.

15 4.

16 The convictions, as described in Paragraph 3 above, bear a substantial
17 relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the
18 qualifications, functions or duties of a real estate licensee.

19 5.

20 The crimes of which Respondent was convicted, as described in Paragraph 3
21 above, constitute cause under Sections 490 and 10177(b) of the Code for the suspension or
22 revocation of the license and license rights of Respondent under the Real Estate Law.

23 //

24 //

25 //

26 //

27 //

ACCUSATION

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

14
15
16
17
18
19
20
21
22
23
24
25
26
27

15
16
17
18
19
20
21
22
23
24
25
26
27

20

21

22

23

24

25

26

27

21
22
23
24
25
26
27

22

23

24

25

26

27

23

24

25

26

27

24

25

26

27

25

26

27

26

27

27

* * *

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 ALBERT MAGBAG DELA CRUZ 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 13 day of September, 2022.

Veronica Kilpatrick

Veronica Kilpatrick
Supervising Special Investigator

cc: ALBERT MAGBAG DELA CRUZ
Casamerica Realtors Inc.
Veronica Kilpatrick
Sacto.

ACCUSATION