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FILED
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DEPT. OF REAL ESTATE
By *[Signature]*

9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation against
13 RENE ANGEL SANCHEZ,
14 Respondent.

DRE No. H-42446 LA
ACCUSATION

15 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator for the
16 Department of Real Estate (“DRE” or “Department”) of the State of California, for cause of
17 Accusation against RENE ANGEL SANCHEZ (“Respondent”), is informed and alleges as
18 follows:
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- 20 1. The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
21 State of California, makes this Accusation in her official capacity.
22 2. All references to the “Code” are to the Real Estate Law, Part 1 of Division 4 of
23 the California Business and Professions Code.

24 LICENSE HISTORY

- 25 3. Respondent is presently licensed and/or has license rights under the Code, as a
26 real estate broker with Department of Real Estate (Department) license ID 01386096.

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1 ROC 9: I will not engage in any conduct that is dishonest, fraudulent, or would
2 adversely impact the integrity of the course(s) I am completing and the conditions for which I
3 am seeking licensure or renewal of licensure.

4 22. By using the services of another to complete Respondent CE and receiving
5 fraudulent course credits through a non-existent course, Respondent violated ROC 3, 5, 8, and
6 9, and engaged in conduct that was dishonest, fraudulent, and that adversely impacted the
7 integrity of the courses Respondent completed and the conditions and qualifications for which
8 Respondent sought licensure or renewal of licensure.

9 Financial Responsibility, Character, and General Fitness

10 23. Pursuant to Code section 10166.05(c), the Commissioner must deny a MLO
11 license endorsement if the licensee fails to meet the minimum criteria for licensure, which
12 includes a requirement that the applicant “has demonstrated such financial responsibility,
13 character and general fitness as to command the confidence of the community and to warrant a
14 determination that the [MLO] will operate honestly, fairly, and efficiently within the purposes
15 of this division.”

16 24. As described in paragraphs 18 through 23 above, Respondent violated ROC 3, 5,
17 8 and 9 by using the services of another, REES, to falsely obtain course credits through an in-
18 person course that Respondent never attended for the year 2020.

19 25. In violating the ROC by using the services of another to falsely obtain course
20 credits, Respondent does not meet the minimum criteria for licensure under Code section
21 10166.05(c). The conduct of Respondent, as alleged above, is grounds for the suspension or
22 revocation of Respondent’s license, MLO license endorsement, and license rights pursuant to
23 the provisions of Code sections 10166.051(a), 10166.051(b), 10177(d), 10177(g) and/or
24 10177(j).

25 GROUND FOR DISCIPLINARY ACTION

26 26. Code section 10166.05 provides in pertinent part, “Notwithstanding any other
27 provision of law, the commissioner shall not issue a license endorsement to act as a mortgage

1 loan originator to an applicant unless the commissioner makes all of the following findings:

2 ...

3 (c) The applicant has demonstrated such financial responsibility, character, and
4 general fitness as to command the confidence of the community and warrant a determination
5 that the mortgage loan originator will operate honestly, fairly, and efficiently within the
6 purposes of this article.”

7 27. Code section 10166.051 provides in pertinent part, “...the commissioner may do
8 one or more of the following, after appropriate notice and opportunity for hearing:

9 (a) Deny, suspend, revoke, restrict, or decline to renew a mortgage loan
10 originator license endorsement for a violation of this article, or any rules or regulations adopted
11 hereunder.

12 (b) Deny, suspend, revoke, condition, or decline to renew a mortgage loan
13 originator license endorsement, if an application or endorsement holder fails at any time to
14 meet the requirements of Section 10166.05 or 10166.09, or withholds information or makes a
15 material misstatement in an application for a license endorsement or license endorsement
16 renewal.”

17 28. Code section 10177 provides in pertinent part, “[t]he Commissioner may
18 suspend or revoke the license of a real estate licensee, delay the renewal of a license of a real
19 estate licensee, or deny the issuance of a license to an applicant, who has done any of the
20 following...

21 ...

22 (d) Willfully disregarded or violated the Real Estate Law (Part 1 (commencing
23 with Section 10000)) or Chapter 1 (commencing with Section 11000) of Part 2 or the rules and
24 regulations of the commissioner for the administration and enforcement of the Real Estate Law
25 and Chapter 1 (commencing with Section 11000) of Part 2.

26 (g) Demonstrated negligence or incompetence in performing an act for which
27 the officer, director, or person is required to hold a license.

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(j) Engaged in any other conduct, whether of the same or of a different character than specified in this section, that constitutes fraud or dishonest dealing.

COSTS

(INVESTIGATION AND ENFORCEMENT COSTS)

29. 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 the real estate license(s), MLO endorsement, and/or license rights of Respondent RENE ANGEL SANCHEZ 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 Mar 6, 2023 at San Diego, California.

Veronica Kilpatrick

Veronica Kilpatrick
Supervising Special Investigator

cc: Rene Angel Sanchez
Veronica Kilpatrick
Sacto.