

DIANE LEE, Counsel (SBN 247222)
Department of Real Estate
320 West 4th Street, Suite 350
Los Angeles, California 90013

Telephone: (213) 559-5990
(Direct) (213) 270-9814

FILED

MAY 19 2025

DEPT. OF REAL ESTATE

By _____

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of	)	No. H-43011 LA
	)	
	)	
JANET LOUISE FARLEY;	)	<u>ACCUSATION</u>
TREVOR BRENT VALENZUELA; and	)	
JONATHAN GABRIEL SANCHEZ,	)	
	)	
Respondents.	)	

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, acting in her official capacity, for cause of Accusation against Respondents JANET LOUISE FARLEY ("FARLEY"), TREVOR BRENT VALENZUELA ("VALENZUELA"), and JONATHAN GABRIEL SANCHEZ ("SANCHEZ") (collectively "Respondents"), is informed and alleges as follows:

1.

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

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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 unless otherwise specified.

(RESPONDENTS' LICENSE HISTORY)

Respondent FARLEY's Real Estate License History

3.

Respondent FARLEY is presently licensed and/or has license rights under the Real Estate Law as a real estate broker (license number 01005494). Respondent FARLEY was originally licensed as a real estate broker on or about October 27, 1988, and has been so licensed from on or about October 27, 1988 to October 26, 1996, December 12, 1996 to December 11, 2000, April 9, 2002 to April 8, 2006, and June 21, 2017 through the present.

4.

From on or about June 21, 2017 through the present, Respondent FARLEY's mailing address with the Department of Real Estate has been 75 Dixie Farms Rd., Louisburg, NC 27549. From on or about February 14, 2022 through the present, Respondent FARLEY's main office address with the Department of Real Estate has been 3200 Paseo Village Way 1412, San Diego, CA 92130. From on or about July 6, 2017 to June 16, 2021, Respondent FARLEY's main office address was 13438 Aubrey St., Poway, CA 92064.

5.

At no time has Respondent FARLEY had a fictitious business name registered with the Department of Real Estate.

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1 6.

2 Respondent FARLEY has been the sponsoring broker for Respondent
3 SANCHEZ from on or about January 27, 2023 through the present and Respondent
4 VALENZUELA from on or about October 10, 2017 to July 31, 2018, February 22, 2022 to
5 January 13, 2024, and February 9, 2024 through the present.

6
7 *Respondent VALENZUELA's Real Estate License History*

8 7.

9 Respondent VALENZUELA is presently licensed and/or has license rights
10 under the Real Estate Law as a real estate salesperson (license number 01995458). Respondent
11 VALENZUELA was originally licensed as a real estate salesperson on or about December 29,
12 2015, and has been so licensed from on or about December 29, 2015 to December 28, 2019,
13 January 14, 2020 to January 13, 2024, and February 9, 2024 through the present.

14 8.

15 From on or about December 29, 2015 to January 13, 2020, VALENZUELA's
16 address of record with the Department of Real Estate was 13438 Aubrey St., Poway, CA
17 92064. From on or about January 14, 2020 to February 8, 2024, VALENZUELA's address of
18 record with the Department of Real Estate was 5035 Del Monte Ave., #1, San Diego, CA
19 92107. From February 9, 2024 through the present, VALENZUELA's address of record with
20 the Department of Real Estate has been 4303 Coronado Ave., San Diego, CA 92107.

21 9.

22 At no time has Respondent VALENZUELA had a fictitious business name
23 registered with the Department of Real Estate.

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10.

Respondent VALENZUELA's sponsoring brokers have been:

Sponsoring Broker (License Number)	Designated Officer (License Number)	Dates of Sponsorship
Real Estate of the Pacific, Inc. (01767484)	Valerie Susan Swanson (01803552)	January 20, 2016 to October 3, 2017
Janet Louise Farley (01005494)	NA	October 10, 2017 to July 31, 2018
Big Block Realty, Inc. (01885775)	Kimberly Tyler McKeag (01981341)	August 1, 2018 to December 28, 2018; January 14, 2020 to February 21, 2022
Janet Louise Farley (01005494)	NA	February 22, 2022 to January 13, 2024; February 9, 2024 through the present

Respondent SANCHEZ's Real Estate License History

11.

Respondent SANCHEZ is presently licensed and/or has license rights under the Real Estate Law as a real estate salesperson (license number 02117990). Respondent SANCHEZ was originally licensed as a real estate salesperson on or about September 29, 2020, and has been so licensed since then.

At no time has Respondent SANCHEZ had a fictitious business name registered with the Department of Real Estate.

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Respondent SANCHEZ's sponsoring brokers have been:

Sponsoring Broker (License Number)	Designated Officer (License Number)	Dates of Sponsorship
eXp Realty of California, Inc. (01878277)	Deborah Lynn Penny (01022642)	October 5, 2020 to October 31, 2021
TD Holdings I, Inc. (01870514)	D Ty Stewart (01445777) ¹	November 1, 2021 to January 17, 2022
eXp Realty of California, Inc. (01878277)	Deborah Lynn Penny (01022642)	January 18, 2022 to January 26, 2023
Janet Louise Farley (01005494)	NA	January 27, 2023 through the present

(UNLICENSED ENTITIES)

Covenant Realty of CA, LLC

12.

At no time has Covenant Realty of CA, LLC been licensed with the California Department of Real Estate in any capacity.

13.

On or about June 19, 2017, Respondent FARLEY signed and filed the Articles of Organization for Covenant Realty of CA, LLC with the California Secretary of State. Respondent FARLEY identified herself as the organizer. These Articles of Organization also stated its mailing address as 75 Dixie Farms Rd., Louisburg, NC 27549 and its office address as 13438 Aubrey St., Poway, CA 92064.

¹ D Ty Stewart (license number 01445777) was the designated officer of TD Holdings I, Inc. from on or about January 11, 2019 to May 25, 2023. Dan Harlan Hill (license number 01217407) has been its designated officer from on or about March 1, 2024 through the present.

14.

On or about September 19, 2021, Respondent FARLEY filed a Statement of No Change for Covenant Realty of CA, LLC with the California Secretary of State, and identified herself as a member. On or about June 8, 2023, Respondent FARLEY filed a Statement of Information for Covenant Realty of CA, LLC with the California Secretary of State identifying its business as "real estate." This Statement of Information states its mailing address is 75 Dixie Farms Rd., Louisburg, NC 27549, and its principal office's address is 13438 Aubrey St., Poway, CA 92064. It also states Respondent FARLEY and Jack Ronald Farley are members with their address being 75 Dixie Farms Rd., Louisburg, NC 27549, and Courtney Blair Chapman and John Paul Chapman, Jr. are members with their address being 25 Dixie Farms Rd., Louisburg, NC 27549.

15.

On or about May 1, 2025, Covenant Realty of CA, LLC was suspended by the California Secretary of State for failing to file tax returns and/or pay taxes.

Blueprint Home Builders, LLC

16.

At no time has Blueprint Home Builders, LLC been licensed with the California Department of Real Estate in any capacity. At no time has Blueprint Home Builders, LLC been a fictitious business name for FARLEY, VALENZUELA, and/or SANCHEZ.

Valencorp

17.

At no time has Valencorp been licensed with the California Department of Real Estate in any capacity. At no time has Valencorp been a fictitious business name for FARLEY, VALENZUELA, and/or SANCHEZ.

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1 *Savas Realty*

2 18.

3 At no time has Savas Realty been licensed with the California Department of
4 Real Estate in any capacity. At no time has Savas Realty been a fictitious business name for
5 FARLEY, VALENZUELA, and/or SANCHEZ. Savas Realty's managing partner is FARLEY.
6 Savas Realty's founder and partner is Joseph Jordan Rodriguez Valenzuela.

7
8 *American Home Shield*

9 19.

10 At no time has American Home Shield been licensed with the California
11 Department of Real Estate in any capacity. At no time has American Home Shield been a
12 fictitious business name for FARLEY, VALENZUELA, and/or SANCHEZ.

13
14 *Caleb Brandalise*

15 20.

16 At no time has Caleb Brandalise been licensed with the California Department
17 of Real Estate in any capacity.

18
19 *Joseph Jordan Rodriguez Valenzuela*

20 21.

21 At no time has Joseph Jordan Rodriguez Valenzuela aka Joseph Valenzuela has
22 been licensed with the California Department of Real Estate in any capacity.

23 22.

24 From on or about August 9, 2021 through the present, Joseph Jordan Rodriguez
25 Valenzuela has been licensed as a real estate sales agent (license number 718361) with the
26 Texas Real Estate Commission with FARLEY as his responsible broker (license no. 696531).

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1 (SALESPERSONS WITHOUT FARLEY AS A RESPONSIBLE BROKER)

2
3 *Christina Marie Schwalm*

4 23.

5 Christina Marie Schwalm (salesperson license no. 01940225) has been licensed
6 as a real estate salesperson (license no. 01940225) from on or about November 5, 2013 through
7 the present. Christina Marie Schwalm's most recent responsible broker was Platinum Desert
8 Realty, Inc. (license no. 02112380) from on or about March 11, 2021 to April 20, 2022.
9 Christina Marie Schwalm has not had a responsible broker from on or about April 21, 2022
10 through the present. Christina Marie Schwalm is not now, and has never been, licensed with
11 FARLEY as her responsible broker.

12
13 *Brent Evan Schwalm*

14 24.

15 Brent Evan Schwalm (salesperson license no. 02008124) has been licensed as a
16 real estate salesperson (license no. 02008124) from on or about April 6, 2017 through the
17 present. Brent Evan Schwalm's most recent responsible broker was Platinum Desert Realty,
18 Inc. (license no. 02112380) from on or about March 11, 2021 to February 14, 2023. Brent
19 Evan Schwalm has not had a responsible broker from on or about February 15, 2023 through
20 the present. Brent Evan Schwalm is not now, and has never been, licensed with FARLEY as
21 his responsible broker.

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1 (LICENSED ACTIVITIES WITHOUT BEING PROPERLY LICENSED)

2 25.

3 Incorporated herein are Paragraphs 3 through 24, above.

4 26.

5 At all times below, Respondents FARLEY, VALENZUELA, and SANCHEZ
6 acted as real estate licensees within the meaning of California Business and Professions Code
7 section 10131(a) (sell or offer to sell, buy or offer to buy, solicit prospective sellers or buyers
8 of, solicit or obtain listings of, or negotiate the purchase, sale, or exchange of real property or a
9 business opportunity).

10 27.

11 FARLEY, VALENZUELA, and SANCHEZ conducted licensed activities under
12 the unlicensed corporation, Covenant Realty of CA, LLC, in several real estate transactions,
13 including, but not limited to, the following transactions. In each and every of the real estate
14 sales transactions described below, Covenant Realty of CA, LLC with FARLEY's real estate
15 broker license number was named as the seller's agent and/or buyer's agent.

16 28.

17 FARLEY allowed VALENZUELA and SANCHEZ to conduct licensed
18 activities under her unlicensed corporation, Covenant Realty of California, LLC, in several real
19 estate transactions, including, but not limited to, the real estate sales transactions described
20 herein.

21
22 *1400 Broadway, Unit 2201, San Diego, CA 92101*

23 29.

24 From on or about June 9, 2022 to July 15, 2022, FARLEY and VALENZUELA
25 acted through Covenant Realty of CA, LLC as the seller's agent in the sale of 1400 Broadway,
26 Unit 2201, San Diego, CA 92101.

27 ///

1 30.

2 From on or about June 9, 2022 to July 15, 2022, FARLEY and VALENZUELA
3 used an unregistered fictitious business name, "Covenant Realty of CA" in the sale of 1400
4 Broadway, Unit 2201, San Diego, CA 92101.

5 31.

6 On or about June 16, 2022, FARLEY instructed the escrow company to pay the
7 \$6,100.00 commission to Covenant Realty of CA, LLC at VALENZUELA's attention at 13438
8 Aubrey St., Poway, CA 92064. These instructions were in the escrow company's file.

9 32.

10 On or about July 13, 2022, VALENZUELA instructed the escrow company to
11 disburse the \$6,100.00 commissions as follows:

- 12 • \$4,010.00 to VALENZUELA;
- 13 • \$530.00 to FARLEY;
- 14 • \$530.00 to Blueprint Home Builders, LLC;
- 15 • \$530.00 to Valencorp, LLC; and
- 16 • \$500.00 to Christina Marie Schwalm.

17 As a result, the escrow company disbursed the commissions according to VALENZUELA's
18 instructions. These instructions and disbursements were reflected in the escrow company's file.

19 33.

20 Neither Blueprint Home Builders, LLC nor Valencorp has ever been licensed
21 with the Department of Real Estate in any capacity. Christina Marie Schwalm has not had a
22 responsible broker from on or about April 21, 2022 through the present.

23 34.

24 FARLEY knew or should have known how the commission was disbursed.

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26 ///

27 ///

1 205-207 C Ave., Coronado, CA 92118

2 35.

3 From on or about October 17, 2022 to December 7, 2022, FARLEY and
4 VALENZUELA acted through Covenant Realty of CA, LLC as the seller's agent in the sale of
5 205-207 C Ave., Coronado, CA 92118. On or about October 31, 2022, Big Block Realty, Inc.
6 (broker license no. 01885775) by Michelle Christine McCormick (salesperson license no.
7 01995458) were added as seller's agents.

8 36.

9 On or about December 7, 2022, the listing agents' commission was disbursed as
10 follows:

- 11 • \$7,357.50 to VALENZUELA;
- 12 • \$817.50 to FARLEY; and
- 13 • \$800.00 to Brent Evan Schwalm.

14 As a result, the escrow company disbursed the commissions according to VALENZUELA's
15 instructions. These disbursements were reflected in the escrow company's file.

16 37.

17 From on or about March 11, 2021 to February 14, 2023, Brent Evan Schwalm's
18 responsible broker was Platinum Desert Realty, Inc. (license no. 02112380). Platinum Desert
19 Realty, Inc. was not a broker in this real estate transaction and did not pay the commission to
20 Brent Evan Schwalm.

21 38.

22 FARLEY knew or should have known how the commission was disbursed.

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1 2227 Whittman St., San Diego, CA 92103

2 39.

3 From on or about January 13, 2023 to March 24, 2023, FARLEY and
4 VALENZUELA acted through Covenant Realty of CA, LLC as the seller's agent and FARLEY
5 and SANCHEZ acted through Covenant Realty of CA, LLC as the buyer's agent in the sale of
6 2227 Whittman St., San Diego, CA 92103. FARLEY and/or Covenant Realty of CA, LLC was
7 as a dual agent.

8 40.

9 FARLEY, VALENZUELA, and SANCHEZ failed to disclose she and/or
10 Covenant Realty of CA, LLC was a dual agent on the California Residential Purchase
11 Agreement and Joint Escrow Instructions. FARLEY also failed to disclose in writing the duties
12 of a dual agent to the seller and buyer.

13 41.

14 On or about March 22, 2023, FARLEY instructed the escrow company to pay
15 Covenant Realty of CA, LLC in the sum of \$39,000.00 in commission for VALENZUELA and
16 another \$39,000.00 in commission for SANCHEZ. As a result, the escrow company disbursed
17 the commissions accordingly. These instructions and disbursements were reflected in the
18 escrow company's file and/or FARLEY's file.

19 42.

20 On or about March 23, 2023, VALENZUELA e-mailed disbursement
21 instructions to the escrow company, and cc-ed FARLEY on this e-mail, as follows:

- 22 • \$7,050 to Covenant Realty of CA, LLC;
- 23 • \$28,700 to VALENZUELA;
- 24 • \$20,200 to SANCHEZ;
- 25 • \$18,650 to Valencorp, LLC;
- 26 • \$2,700 to Caleb Brandalise; and
- 27 • \$700 to Christina Marie Schwalm.

1 As a result, the escrow company disbursed the commissions accordingly. These instructions
2 and disbursements were reflected in FARLEY's file and/or the escrow company's file.

3 43.

4 On or about March 24, 2023, FARLEY e-mailed the escrow company that she
5 approved VALENZUELA's disbursement instructions.

6 44.

7 Neither Valencorp, LLC nor Caleb Brandalise has ever been licensed with the
8 Department of Real Estate in any capacity. Christina Marie Schwalm is not now, and has never
9 been, licensed with FARLEY as her responsible broker.

10 45.

11 FARLEY knew or should have known how the commission was disbursed.

12
13 *10938 Eddington Rd., San Diego, CA 92071*

14 46.

15 From on or about April 5, 2023 to May 30, 2023, FARLEY and VALENZUELA
16 acted through Covenant Realty of CA, LLC as the seller's agent in the sale of 10938 Eddington
17 Rd., San Diego, CA 92071.

18 47.

19 On or about May 30, 2023, VALENZUELA instructed the escrow company to
20 disburse the commission as follows:

- 21 • \$2,200 to Covenant Realty of CA, LLC;
- 22 • \$16,825 to VALENZUELA;
- 23 • \$2,200 to Valencorp, LLC; and
- 24 • \$1,100 to Caleb Brandalise.

25 As a result, the escrow company disbursed the commissions accordingly. These instructions
26 and disbursements were reflected in the escrow company's file and/or FARLEY's file.

27 ///

1 48.

2 Neither Valencorp, LLC nor Caleb Brandalise has ever been licensed with the
3 Department of Real Estate in any capacity.

4 49.

5 FARLEY knew or should have known how the commission for the sale of
6 10938 Eddington Rd., San Diego, CA 92071 was disbursed.

7
8 *1000 Eagle Mountain Dr., Big Bear City, CA 92314*

9 50.

10 From on or about April 10, 2023 to May 12, 2023, FARLEY and SANCHEZ
11 acted through Covenant Realty of CA, LLC as the buyer's agent in the sale of 1000 Eagle
12 Mountain Dr., Big Bear City, CA 92314.

13 51.

14 On or about April 19, 2023, VALENZUELA signed FARLEY's name on the
15 Instructions to Pay Commissions that instructed the escrow company to pay \$15,000.00 in
16 commissions to Covenant Realty of CA, LLC. That same day, VALENZUELA e-mailed these
17 instructions as an attachment to the escrow company with a carbon copy to FARLEY. The
18 body of the e-mail instructed the escrow company to disburse the commission as follows:

- 19 • \$10,500 to SANCHEZ at 4639 Wilson Ave., San Diego, CA 92116;
20 • \$1,500 to VALENZUELA at 13754 Mango Dr., #106, Del Mar, CA 92014;
21 • \$1,500 to Covenant Realty of CA, LLC at 75 Dixie Farms Rd., Louisburg,
22 NC 27549; and
23 • \$1,500 to Valencorp, LLC at 11106 W. Cave Circle, Dripping Springs, TX
24 78620.

25 As a result, the escrow company disbursed the commissions accordingly. These instructions
26 and disbursements were reflected in the escrow company's file and/or FARLEY's file.

27 ///

1 52.

2 FARLEY knew or should have known how the commission for the sale of 1000
3 Eagle Mountain Dr., Big Bear City, CA 92314 was disbursed.

4
5 9752 Cambury Ct., Santee, CA 92071

6 53.

7 From on or about November 5, 2023 to December 8, 2023, FARLEY and
8 SANCHEZ acted through Covenant Realty of CA, LLC and Savas Realty, both unlicensed with
9 the Department of Real Estate, as the buyer's agent in the sale of 9752 Cambury Ct., Santee,
10 CA 92071.

11 54.

12 On or about November 17, 2023, Joseph Jordan Rodriguez Valenzuela aka
13 Joseph Rodriguez submitted Commission Instructions instructing the escrow company to
14 disburse \$18,787.50 in commissions to Covenant [sic] Realty of CA, LLC, at SANCHEZ's
15 attention, at 3200 Paseo Village Way, #1412, San Diego, CA 92130. Joseph Jordan Rodriguez
16 Valenzuela signed as a broker of "Covenant [sic] Realty of CA, LLC."

17 55.

18 At no time has Joseph Jordan Rodriguez Valenzuela has been licensed with the
19 California Department of Real Estate in any capacity. However, Joseph Jordan Rodriguez
20 Valenzuela conducted activities that required a real estate license.

21 56.

22 From on or about August 9, 2021 through the present, Joseph Jordan Rodriguez
23 Valenzuela has been licensed as a real estate sales agent (license number 718361) with the
24 Texas Real Estate Commission with FARLEY has his responsible broker.

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1 57.

2 On or about November 17, 2023, FARLEY instructed the escrow company to
3 disburse the commissions as follows:

- 4 • \$375.00 to Savas Realty as the “selling broker”;
5 • \$15,030.00 to SANCHEZ as the selling agent; and
6 • \$3,381.75 to Valencorp, Inc. as a contractor.

7 As a result, the escrow company disbursed the commissions accordingly. These instructions
8 and disbursements were reflected in the escrow company’s file and/or FARLEY’s file.

9 58.

10 FARLEY knew or should have known how the commission for the sale of 9752
11 Cambury Ct., Santee, CA 92071 was disbursed.

12
13 *24980 Greenhouse Ct., Wildomar, CA 92595*

14 59.

15 From on or about December 30, 2023 to January 30, 2024, FARLEY and
16 VALENZUELA acted through Covenant Realty of CA, LLC as the buyer’s agent in the sale of
17 24980 Greenhouse Ct., Wildomar, CA 92595.

18 60.

19 On or about January 30, 2024, FARLEY (or someone on behalf of FARLEY)
20 and VALENZUELA signed a Commissions Disbursement Agreement authorizing escrow
21 company to disburse the commissions as follows:

- 22 • \$1,185.00 to Covenant Realty of CA, LLC at 75 Dixie Farms Rd.,
23 Louisburg, NC 27549;
24 • \$10,475.00 to VALENZUELA; and
25 • \$190.00 to American Home Shield.

26 As a result, the escrow company disbursed the commissions accordingly. These instructions
27 and disbursements were reflected in FARLEY’s file and/or the escrow company’s file.

1 61.

2 FARLEY knew or should have known how the commission for the sale of
3 24980 Greenhouse Ct., Wildomar, CA 92595 was disbursed.

4
5 (VIOLATIONS)

6 62.

7 The conduct, acts, and/or omissions of Respondent FARLEY, as set forth in
8 paragraphs 3 to 61, above, are in violation of Code sections 10130 (license required for
9 licensed activities), 10137 (unlawful payment and/or acceptance of compensation), 10138
10 (unlawful payment of compensation), 10159.5 (unlicensed fictitious business name), 10176(d)
11 (acting for more than one party without knowledge or consent of all parties), 10177(d) (willful
12 disregard or violation of Real Estate Law), 10177(g) (negligence and/or incompetence), and
13 10177(h) (failure to exercise reasonable supervision over activities of salespersons) and
14 Regulations section 2725 (failure to exercise reasonable supervision over activities of
15 salespersons).

16 63.

17 The conduct, acts, and/or omissions of Respondent VALENZUELA, as set forth
18 in paragraphs 3 to 52 and 59 to 61, above, are in violation of Code sections 10130 (license
19 required for licensed activities), 10137 (unlawful payment and/or acceptance of compensation),
20 10138 (unlawful payment of compensation), 10159.5 (unlicensed fictitious business name),
21 10176(d) (acting for more than one party without knowledge or consent of all parties),
22 10177(d) (willful disregard or violation of Real Estate Law), and 10177(g) (negligence and/or
23 incompetence).

24 64.

25 The conduct, acts, and/or omissions of Respondent SANCHEZ, as set forth in
26 paragraphs 3 to 28, 39 to 45, and 50 to 58, above, are in violation of Code sections 10130
27 (license required for licensed activities), 10137 (unlawful payment and/or acceptance of

1 compensation), 10138 (unlawful payment of compensation), 10159.5 (unlicensed fictitious
2 business name), 10176(d) (acting for more than one party without knowledge or consent of all
3 parties), 10177(d) (willful disregard or violation of Real Estate Law), and 10177(g) (negligence
4 and/or incompetence).

5 65.

6 Code section 10106 provides, in pertinent part, that in any order issued in
7 resolution of a disciplinary proceeding before the department, the Commissioner may request
8 the administrative law judge to direct a licensee found to have committed a violation of this
9 part to pay a sum not to exceed the reasonable costs of investigation and enforcement of the
10 case.

11 WHEREFORE, Complainant prays that a hearing be conducted on the
12 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
13 disciplinary action against all license(s) and/or license rights under the Real Estate Law (Part 1
14 of Division 4 of the California Business and Professions Code) of Respondents JANET
15 LOUISE FARLEY, TREVOR BRENT VALENZUELA, and JONATHAN GABRIEL
16 SANCHEZ, including, but not limited to, broker license(s) and salesperson license(s), the cost
17 of investigation and enforcement as permitted by law, and for such other and further relief as
18 may be proper under applicable provisions of law.

19 Dated at San Diego, California: May 15, 2025.

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21 
22 Veronica Kilpatrick
23 Supervising Special Investigator

24 cc: Janet Louise Farley
25 Trevor Brent Valenzuela
26 Jonathan Gabriel Sanchez
27 Veronica Kilpatrick
Sacto.