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DEPT. OF REAL ESTATE

By

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Attorney for Complainant

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation Against,) DRE No. H-43130 LA
)
TERRILL ANDRE WRIGHT,)
) ACCUSATION
Respondent.)
_____)

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for cause of Accusation against TERRILL ANDRE WRIGHT ("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 with Department of Real Estate ("Department") License ID 02165676.

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ACCUSATION

1 CRIMINAL CONVICTION

2 3.

3 a. On or about July 31, 2023, in the Superior Court of California, County of
4 Riverside, Case No. Case No. SWF2301112, the State of California filed a Felony Complaint
5 against Respondent alleging Respondent violated Penal Code sections 33215 (manufacture,
6 offer, or possess a short-barreled rifle), 30605(a) (possess an assault weapon), and 273d(a)
7 (inflict cruel and inhuman corporal punishment and injury upon a child), felonies.

8 b. On or about November 4, 2024, in Case No. SWF2301112, Respondent was
9 convicted on a plea of guilty to a violation of Penal Code section 242 (battery), a misdemeanor.
10 The court suspended the imposition of sentence and placed Respondent on summary probation
11 for twelve (12) months. The court ordered Respondent to serve ninety (90) days in custody,
12 eighty-six (86) days of which to be served in a work release program.

13 4.

14 The conviction, as described in Paragraph 3(b) above, bears a substantial
15 relationship under Section 2910, Title 10, Chapter 6, of the California Code of Regulations to
16 the qualifications, functions or duties of a real estate licensee.

17 5.

18 The crime for which Respondent was convicted, as described in Paragraph 3
19 above, constitutes cause under Code sections 490 and 10177(b) for the suspension or
20 revocation of the license and license rights of Respondent under the Real Estate Law.

21 FAILURE TO REPORT FELONY COMPLAINT AND CONVICTION

22 6.

23 Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing,
24 "[t]he bringing of a criminal complaint, information, or indictment charging a felony against
25 the licensee" and "[t]he conviction of the licensee, including any verdict of guilty, or plea of
26 guilty or no contest, of any felony or misdemeanor" to the Department within thirty (30) days
27 of the date of conviction. Respondent failed to timely report in writing to the Department the
28 felony complaint and conviction described in Paragraph 3 above.

1 7.

2 Respondent's failure to timely report the felony complaint and conviction
3 described in Paragraph 3 above constitutes cause under Section 10186.2 of the Code for the
4 suspension or revocation of the license and license rights of Respondent under the Real Estate
5 Law.

6 COSTS OF INVESTIGATION AND ENFORCEMENT

7 8.

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

13 WHEREFORE, Complainant prays that a hearing be conducted on the
14 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
15 disciplinary action against all the licenses and license rights of TERRILL ANDRE WRIGHT
16 under the Real Estate Law, for the costs of investigation and enforcement as permitted by law,
17 and for such other and further relief as may be proper under other applicable provisions of law.

18
19 Dated at San Diego, California this 26 day of June, 2025.

20
21 
22 Veronica Kilpatrick
23 Supervising Special Investigator

24
25 cc: TERRILL ANDRE WRIGHT
26 Coldwell Banker Residential
27 300 Commerce, Ste. 250
28 Irvine, California 92602
Veronica Kilpatrick
Sacto.

ACCUSATION