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DEPT. OF REAL ESTATE

By [REDACTED]

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BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

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In the Matter of the Accusation Against, ) DRE No. H-43191 LA  
)  
CESAR BOBADILLA and )  
NICHOLAS HUNTER BROWN, )  
) ACCUSATION  
Respondents. )  
)

The Complainant, Veronica Kilpatrick a Supervising Special Investigator of the State of California, for cause of Accusation against CESAR BOBADILLA ("BOBADILLA") and NICHOLAS HUNTER BROWN ("BROWN") (sometime referred to as "Respondents") 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.

All references to the "Code" are to the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code and all references to "Regulations" are to Title 10, Chapter 6, of the California Code of Regulations.

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ACCUSATION

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1 7.

2 On or about August 1, 2023, BOBADILLA entered into an Independent  
3 Contractor Agreement ("ICA") with BROWN. In the ICA, BOBADILLA listed his licensed  
4 fictitious names as "Sundance Realty, Sundance Properties and West Coast Property  
5 Managers." BROWN would act as the office manager for West Coast Property Managers.  
6 BROWN would receive 90% of the commission on real estate sales transactions and 100% of  
7 the commission on all property management fees. West Coast Property Managers, however, is  
8 not a licensed fictitious business name issued under BOBADILLA's broker license with the  
9 Department.

10 8.

11 From August 2023, through January 2025, West Coast Property Managers  
12 entered into the following eight (8) Property Management Agreements ("PMA") with the  
13 property owners for the following properties:

- 14 a. \*\*\*\*\* Billie Ann Road, Wildomar, California
- 15 b. \*\*\*\*\* Birtchfield Drive, Temecula, California
- 16 c. \*\*\*\*\* Fernwood Lane, Perris, California
- 17 d. \*\*\*\*\* Cherry Hills Boulevard, Menifee, California
- 18 e. \*\*\*\*\* Branson Drive, Homeland, California
- 19 f. \*\*\*\*\* Orange Street, Wildomar, California
- 20 g. \*\*\*\*\* Palermo Court, Murrieta, California
- 21 h. \*\*\*\*\* Thicket Place, Corona, California

22 BROWN signed the PMAs as the office manager of West Coast Property Managers and listed  
23 BOBADILLA's real estate license ID for West Coast Property Managers on the Property  
24 Management Agreements. The property owners agreed to pay BROWN a monthly management  
25 fee of \$100.00 and a flat fee of \$1,000.00 for renting or leasing.

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9.

The PMA for \*\*\*\*\* Thicket Place, Corona, California, provided by BOBADILLA, has a handwritten correction on Page 5 of the agreement correcting the DRE license number of West Coast Property Managers from "01878797," which is BROWN's license number, to "01962129," which is BOBADILLA's license number. Next to the handwritten correction are handwritten initials of "MG," "PA," and "NB." According to the property owners of the Thicket Place property, there are no handwritten alterations on their copy of the agreement, nor did the property owners initial Page 5 of the agreement.

10.

For each of the eight properties, West Coast Property Managers, as the property manager, and the tenant(s) of the properties signed a Residential Lease Agreement ("RLA"). BROWN signed the RLAs as the agent for West Coast Property Managers. BROWN listed West Coast Property Managers as the real estate broker with BOBADILLA's real estate license ID 01962129. Each RLA instructed the tenants to make the rent payment payable to West Coast Property Managers and to deliver the payments to BROWN.

11.

BOBADILLA provided the January 2025 bank records for the account holding security deposits and rent payments collected by BROWN. According to the bank records for January 2025 at PNC Bank, Account No. XX-XXXX-8925, the bank account holding trust funds is in the name of West Coast Property Managers. The bank signature card for the PNC Bank account shows that BROWN and "Robert Brown" were the signatories of the bank account from August 31, 2023, through March 26, 2025. From March 27, 2025, through April 1, 2025, BROWN was the sole signatory. BOBADILLA did not provide a copy of any written authorization for BROWN to make withdrawals from the bank account holding trust funds. Starting April 2, 2025, BOBADILLA, along with BROWN, were the signatories of the PNC bank account.

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12.

BROWN maintains the website www.westcoastpropertymanagers.com for his property management activities. BROWN's website does not disclose BROWN'S real estate license number, nor does it disclose BOBADILLA's name.

(USE OF UNLICENSED FICTITIOUS NAME)

13.

The conduct, acts and/or omissions, as described above, constitute cause for the suspension or revocation of the license and license rights of Respondents under Code section 10159.5 and Regulations section 2731 for conducting property management activities using an unlicensed fictitious name without first having BOBADILLA's real estate broker license issued under that fictitious business name.

(TRUST FUND HANDLING)

14.

The conduct, acts and/or omissions of Respondents, as described above, constitute cause for the suspension or revocation of the license and license rights of Respondents under Code section 10145 and Regulations 2832, for accepting and receiving trust funds, from or on behalf of the owners of the properties managed by West Coast Property Managers and failing to designate the account holding trust funds at PNC Bank as a trust account in the name of the broker, or in a fictitious name if the broker is the holder of a license bearing such fictitious name, as trustee.

(TRUST ACCOUNT WITHDRAWALS)

15.

For a period of time, BROWN was the sole signatory of the bank account holding trust funds without first obtaining written authorization from BOBADILLA which constitutes cause for the suspension or revocation of the license and license rights of Respondents under Regulations section 2834.

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(UNLAWFUL PAYMENT OF COMPENSATION)

16.

The conduct, acts and/or omissions of Respondents, as described above, constitute cause for the suspension or revocation of the license and license rights of Respondents under Code section 10137. BROWN accepted compensation for activity requiring a real estate license from the owners of the properties managed by West Coast Property Managers and not directly from BOBADILLA, who is the broker under whom BROWN is at the time licensed.

(FAILURE TO DISCLOSE LICENSED STATUS IN ADVERTISING)

17.

The conduct, acts and/or omissions of Respondents, as described above, constitute cause for the suspension or revocation of the license and license rights of Respondents under Code section 10140.6 and Regulations section 2773. BROWN failed to disclose his real estate license number and BOBADILLA's name on BROWN's website [www.westcoastpropertymanagers.com](http://www.westcoastpropertymanagers.com).

(FRAUD OR DISHONEST DEALING)

18.

The conduct, act and/or omissions of BROWN, as described in Paragraph 9 above, constitute cause for the suspension or revocation of the license and license rights of Respondent under Code sections 10176(i) and 10177(j), for fraud or dishonest dealing.

(SUBSTANTIAL MISREPRESENTATION, NEGLIGENCE/INCOMPETENCE)

19.

The conduct, act and/or omissions of Respondents and each of the foregoing violations above constitute cause for the suspension or revocation of the real estate license and/or license rights of Respondents under the provisions of Sections 10176(a), 10177(d), and/or 10177(g).

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(FAILURE TO SUPERVISE)

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Based on the conduct, acts and/or omissions of BROWN, BOBADILLA failed to exercise reasonable supervision over the activities of BROWN to ensure full compliance with the Real Estate Law and Regulations in violation of Code section 10177(h) and Regulations section 2725.

COSTS OF INVESTIGATION AND ENFORCEMENT

21.

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 CESAR BOBADILLA and NICHOLAS HUNTER BROWN 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 30 day of October, 2025.



Veronica Kilpatrick  
Supervising Special Investigator

cc: CESAR BOBADILLA  
NICHOLAS HUNTER BROWN  
Veronica Kilpatrick  
Sacto.