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FILED

JUN 17 2026

DEPT. OF REAL ESTATE

By- 

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of	)	No. H-43285 LA
	)	
CARLOS S. MORENO,	)	
	)	ACCUSATION
Respondent.	)	
_____	)	

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California for cause of Accusation against CARLOS S. MORENO aka Carlos Saavedra Moreno ("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 is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code as a real estate salesperson (license no. 01140202).

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1 FIRST CAUSE OF ACTION

2 (CRIMINAL CONVICTIONS IN CASE NO. RIF1902000)

3 3.

4 On or about May 7, 2019, in the Superior Court of California, County of
5 Riverside, case no. RIF1902000, a felony complaint was filed alleging Respondent violated
6 California Penal Code sections 288(c)(1) (lewd act upon a child of 14 or 15 years old when
7 person is at least 10 years older than child), 288(a) (lewd act upon a child under 14 years old),
8 and 136.1(b)(1) (willfully and lawfully attempting to present and dissuade victim for reporting
9 a suspected crime), all felonies.

10 4.

11 On or about May 24, 2019, Respondent acknowledged at the arraignment
12 hearing that he was aware of the complaint described in Paragraph 3, above.

13 5.

14 On or about September 17, 2025, a First Amended Information was filed
15 alleging Respondent violated California Penal Code sections 288(c)(1) (lewd act upon a child
16 of 14 or 15 years old when person is at least 10 years older than child) and 288(a) (lewd act
17 upon a child under 14 years old), both felonies, and California Penal Code sections 136.1(b)(1)
18 (willfully and lawfully attempting to present and dissuade victim for reporting a suspected
19 crime) and 242 (battery), both misdemeanors.

20 6.

21 On or about October 27, 2025, Respondent was convicted of violating California
22 Penal Code sections 136.1(b)(1) (willfully and lawfully attempting to present and dissuade
23 victim for reporting a suspected crime) and 242 (battery), both misdemeanors. In part,
24 Respondent was sentenced to serve 36 months of summary probation, be committed to the
25 custody of the Riverside Sheriff for 180 days with 179 days to be served in the Work Release
26 Program, complete 32 sex offender classes, pay \$1,400.00 in victim restitution, and pay various
27 fines and fees. A criminal protective order was also issued. These crimes are substantially

1 related to the qualifications, functions, or duties of a real estate licensee under Section 2910,
2 Title 10, Chapter 6, California Code of Regulations.

3 7.

4 The crimes of which Respondent was convicted, as described in Paragraph 6,
5 above, constitute cause under California Business and Professions Code sections 490 and
6 10177(b) for the suspension or revocation of the license and license rights of Respondent under
7 the Real Estate Law.

8
9 SECOND CAUSE OF ACTION

10 (FAILURE TO REVEAL PENDING CHARGES)

11 8.

12 On or about August 7, 2020, Respondent filed a Salesperson Renewal
13 Application. In response to Question 14, to wit: "ARE THERE CRIMINAL CHARGES
14 PENDING AGAINST YOU AT THIS TIME, OR ARE YOU CURRENTLY AWAITING
15 JUDGMENT AND SENTENCING FOLLOWING ENTRY OF A PLEA OR JURY
16 VERDICT? IF YES, COMPLETE ITEM 19," Respondent answered, "Yes," but failed to
17 complete Item 19 with any information about Superior Court of California, County of
18 Riverside, case no. RIF1902000, which is described above.

19 9.

20 On or about March 5, 2025, Respondent filed a Salesperson Renewal
21 Application. In response to Question 14, to wit: "ARE THERE CRIMINAL CHARGES
22 PENDING AGAINST YOU AT THIS TIME, OR ARE YOU CURRENTLY AWAITING
23 JUDGMENT AND SENTENCING FOLLOWING ENTRY OF A PLEA OR JURY
24 VERDICT? IF YES, COMPLETE ITEM 19," Respondent answered, "No," and failed to
25 mention Superior Court of California, County of Riverside, case no. RIF1902000, which is
26 described above.

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10.

Respondent's failure to reveal the pending charges in his renewal applications constitutes knowingly making a false statement of material facts required to be revealed in said applications, which is grounds for denial of the issuance of a license under California Business and Professions Code sections 475(a)(1), 480(e), and 10177(a).

THIRD CAUSE OF ACTION

(FAILURE TO REPORT CONVICTIONS)

11.

A diligent search was made of the Department of Real Estate's records and no record or written notice was received from Respondent notifying the Department of Real Estate within thirty (30) days of the felony complaints described above in Paragraphs 3 and 5 or the convictions described above in Paragraph 6.

12.

Respondent's failure to report the felony complaints and convictions constitute cause under California Business and Professions Code section 10186.2 for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

13.

These proceedings are brought under the provisions of Section 10100, Division 4 of the Business and Professions Code of the State of California and Sections 11500 through 11528 of the California Government Code.

(COSTS)

14.

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, the Commissioner may request the administrative law judge to direct a licensee found to have

1 committed a violation of this part to pay a sum not to exceed the reasonable costs of
2 investigation and enforcement of the case.

3 WHEREFORE, Complainant prays that a hearing be conducted on the
4 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
5 disciplinary action against all licenses and/or license rights under the Real Estate Law (Part 1 of
6 Division 4 of the California Business and Professions Code) of Respondent CARLOS S.
7 MORENO for the cost of investigation and enforcement as permitted by law, and for such other
8 and further relief as may be proper under applicable provisions of law.

9 Dated at San Diego, California: June 17, 2026.

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12 Veronica Kilpatrick
13 Supervising Special Investigator
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24 cc: CARLOS S. MORENO
25 Alicia Medel
26 Veronica Kilpatrick
27 Sacto.