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DEPT. OF REAL ESTATE

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11 **DEPARTMENT OF REAL ESTATE**
12 **STATE OF CALIFORNIA**

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14 **In the Matter of the Accusation of**) **No. H-03372-FR**
15 **ASHLEY LAKAY TOWNSEND,**)
16 **Respondent.**)
17)

18 **The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the**
19 **State of California, for cause of Accusation against Respondent ASHLEY LAKAY**
20 **TOWNSEND ("Respondent"), is informed and alleges as follows:**

21 **1.**

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

24 **//**

25
26 **Accusation**

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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.

RESPONDENT ASHLEY LAKAY TOWNSEND

3.

DRE License History

ASHLEY LAKAY TOWNSEND ("TOWNSEND") is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the Code as a real estate salesperson, Department of Real Estate ("Department" or "DRE") License ID 02067540.

4.

TOWNSEND was first licensed by the Department as a real estate salesperson on or about June 14, 2018.

5.

TOWNSEND's real estate salesperson license will expire on June 13, 2022.

6.

TOWNSEND's current responsible broker is JW Enterprises.

7.

At all times mentioned herein, Respondent TOWNSEND engaged in the performance of activities requiring a real estate license pursuant to Code Section 10130, and acted and ordered, caused, authorized or participated in licensed activities within the meaning of Code Section 10131.

Property Manager Activities

8.

For an unknown period of time prior to July 2019, and continuing to the present,

Accusation

1 said Respondent solicited rental property management contracts and proceeded to do one or
2 more of the following acts for another or others, for or in expectation of compensation: lease or
3 rent or offer to lease or rent, or place for rent, or solicit listings of places for rent, or solicit for
4 prospective tenants, or collect rents from real property, or improvements thereon.

5 9.

6 On or about July 25, 2019, Scott Ehrlich ("Ehrlich"), Office Manager for
7 Ironwood Properties, emailed Department Special Investigator Crawford that ASHLEY
8 LAKAY TOWNSEND worked as a Property Manager at the property "Cedar Ridge" located at
9 "2105 East Ave. J-8 Lancaster." Ehrlich further stated that the Property Manager is
10 "responsible for the day-to-day operations of the property including but not limited to, resident
11 relations, leasing, rent collections, compliance, office administration, and maintenance."

12 10.

13 In the instance alleged above, Respondent performed real estate activities that
14 require a broker license and collected compensation for engaging in such activities when she
15 was not licensed by the Department as a real estate broker.

16 11.

17 The conduct of Respondent, and her agents, associates, affiliates, and/or co-
18 conspirators includes the actions taken with regard to the properties described above by way of
19 example, but is by no means limited to those properties and their owners.

20 **APPLICABLE SECTIONS OF THE REAL ESTATE LAW**

21 **Grounds for Revocation or Suspension – Code Section 10137**

22 10.

23 Pursuant to Code Section 10137, "No real estate salesperson shall accept
24 compensation for activity requiring a real estate license from any person other than the broker
25

26 Accusation

1 under whom he or she is at the time licensed... For a violation of any of the provisions of this
2 section, the commissioner may temporarily suspend or permanently revoke the license of the real
3 estate licensee, in accordance with the provisions of this part relating to hearings.

4 **VIOLATIONS OF THE REAL ESTATE LAW – CAUSES FOR DISCIPLINE**

5 11.

6 Complainant re-alleges and incorporates by reference the preceding paragraphs as
7 set forth herein.

8 12.

9 In the course of the activities described above, and based on the facts discovered
10 by the Department, also described above, the acts and/or omissions of Respondent **ASHLEY**
11 **LAKAY TOWNSEND** are in violation of **Code Section 10137** and constitute cause for the
12 suspension or revocation of all licenses and license rights Respondent **ASHLEY LAKAY**
13 **TOWNSEND** under the Real Estate Law.

14 **COSTS**

15 14.


16 **Code Section 10106** provides, in pertinent part that in any order issued in
17 resolution of a disciplinary proceeding before the Department, the Commissioner may request the
18 administrative law judge to direct a licensee found to have committed a violation of this part to
19 pay a sum not to exceed the reasonable costs of investigation and enforcement of the case.

20 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
21 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary
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27 Accusation

1 action against all the licenses and license rights of Respondent ASHLEY LAKAY TOWNSEND,
2 under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code), and for
3 such other and further relief as may be proper under other applicable provisions of law.

4 Dated at San Diego, California this 10 day of March 2020.

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9 Veronica Kilpatrick
10 Supervising Special Investigator

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cc: ASHLEY LAKAY TOWNSEND
JW Enterprises
Veronica Kilpatrick
Sacto.