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2	Department of Real Estate FILED		
3	Sacramento, CA 95813-7007		
4	Telephone: (916) 263-8672 DEPARTMENT OF REAL ESTATE		
5	(916) 263-3767 (Fax) (916) 263-7303 (Direct)		
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8	BEFORE THE DEPARTMENT OF REAL ESTATE		
9	STATE OF CALIFORNIA		
10	* * *		
11	In the Matter of the Accusation of)		
12) No. H-6764 SAC KATHRYN GAIL KREEGER,)		
13	Respondent.) <u>ACCUSATION</u>		
14)		
15	The Complainant, TRICIA D. PARKHURST, acting in her official capacity as a		
16	Supervising Special Investigator of the State of California, for this Accusation against		
17	KATHRYN GAIL KREEGER ("Respondent"), is informed and alleges as follows:		
18	1		
19	Respondent is presently licensed and/or has license rights under the Real Estate		
20	Law, Part 1 of Division 4 of the California Business and Professions Code ("Code"), as a real		
21	estate broker.		
22	2		
23	On or about April 12, 2016, in the Superior Court of the State of California,		
24	County of Placer, Case No. 62-141340, Respondent was convicted of violating Section 273a(b)		
25	(child abuse-neglect or endangering health) of the California Penal Code and Section 23152(f)		
26	(driving under the influence of a drug) of the California Vehicle Code, misdemeanors and crimes		
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1	that bear a substantial relationship to the qualifications, functions or duties of a real estate
2	
3	licensee pursuant to Section 2910, Title 10, of the California Code of Regulations.
4	<u>GROUNDS FOR DISCIPLINE</u>
	3
5	The facts alleged in Paragraph 2, above, constitute cause under Sections 490
6	(conviction of substantially related crime) and 10177(b) (conviction of substantially related
7	crime) of the Code for the suspension or revocation of all licenses and license rights of
8	Respondent under the Real Estate Law.
9	<u>COST RECOVERY</u>
10	4
11	The Department will seek to recover the costs of the investigation and prosecution
12	of this case pursuant to Section 10106 of the Code which provides, in pertinent part, that in any
13	order issued in resolution of a disciplinary proceeding before the Department, the Commissioner
14	may request the administrative law judge to direct a licensee found to have committed a violation
15	of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement
16	of the case.
17	WHEREFORE, Complainant prays that a hearing be conducted on the allegations
18	of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary
19	action against all licenses and license rights of Respondent under the Real Estate Law, for the
20	cost of investigation and enforcement as permitted by law, and for such other and further relief as
21	may be proper under other provisions of law.
22	Tame of a lot in
23	TRICIA D. PARKHURST
24	Supervising Special Investigator
25	
26	Dated at Sacramento, California,
27	this day of kemper 2018.
	2

DISCOVERY DEMAND

1	DISCOVERY DEMAND	
2	Pursuant to Sections 11507.6, et seq. of the Administrative Procedure Act, the	
3	Department hereby makes demand for discovery pursuant to the guidelines set forth in the	
4	Administrative Procedure Act. Failure to provide Discovery to the Department may result in the	
5	exclusion of witnesses and documents at the hearing or other sanctions that the Office of	
6	Administrative Hearings deems appropriate.	
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