1 TRULY SUGHRUE, Counsel State Bar No. 223266 2 Bureau of Real Estate P.O. Box 137007 3 Sacramento, CA 95813-7007 4 Telephone: (916) 263-8670 (916) 263-8676 (Direct) 5 Fax: (916) 263-3767 6 7 8 BEFORE THE BUREAU OF REAL ESTATE 9 STATE OF CALIFORNIA 10 11 In the Matter of the Accusation of ROBERT VINCENT BRENNAN, 12 Respondent. 13 14 15 16 17 ("Respondent"), and is informed and alleges as follows: 18 19 20 21 estate broker. 22 2 23 On or about August 4, 2017, in the Superior Court of the State of California, 24 25

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No. H- 6652 SAC **ACCUSATION**

The Complainant, TRICIA D. PARKHURST, in her official capacity as a Supervising Special Investigator of the Bureau of Real Estate ("Bureau") of the State of California, brings this Accusation against Respondent ROBERT VINCENT BRENNAN

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) ("Code") as a real

County of El Dorado, Case No. P17CRM0505, Respondent was convicted of violating Section 20001(a) (Hit and Run Causing Injury) of the California Vehicle Code, a crime which bears a substantial relationship under Section 2910, Title 10, of the California Code of Regulations (Regulations) to the qualifications, functions or duties of a real estate licensee.

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At no time did Respondent provide notice of the bringing of an indictment, the charging of a felony, the conviction of Respondent of one or more misdemeanor and/or felony convictions, and/or any disciplinary action taken by another licensing agency, as required by Section 10186.2 of the Code.

GROUNDS FOR DISCIPLINE

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The facts identified in paragraph 2, constitutes cause under Sections 490 and 10177(b) for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

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The facts alleged in paragraphs 2 through 3 constitute cause under Sections 10177(d) and 10186.2 of the Code for suspension or revocation of Respondent's license under the Real Estate Law.

COST RECOVERY

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Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Bureau, 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.

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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 licenses and license rights of Respondent under the Code, for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under the provisions of law.

TRICIA D. PARKHURST Supervising Special Investigator

Dated at Sacramento, California,

this day of 1000, 2018

DISCOVERY DEMAND

Pursuant to Sections 11507.6, et seq. of the Government Code, the Bureau of Real Estate hereby makes demand for discovery pursuant to the guidelines set forth in the Administrative Procedure Act. Failure to provide Discovery to the Bureau of Real Estate may result in the exclusion of witnesses and documents at the hearing or other sanctions that the Office of Administrative Hearings deems appropriate.