1 2 3	Daniel E. Kehew, Counsel (SBN 213550) Department of Real Estate P. O. Box 137007 Sacramento, CA 95813-7007 FILED
4	Telephone: (916) 576-8700 (main) JUN 1 4 2021
5	(916) 576-7842 (direct) DEPARTMENT OF REAL ESTATE By B. H. (Art US)
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8	BEFORE THE DEPARTMENT OF REAL ESTATE
9	STATE OF CALIFORNIA
10	* * *
11	In the Matter of the Accusation of:) NO. H-12520 SF
12	MICHAEL THOMAS FADEEFF, ACCUSATION
13	Respondent.)
14)
15	The Complainant, STEPHANIE YEE, in her official capacity as a Supervising
16	Special Investigator of the State of California, Department of Real Estate ("Department"), for
17	cause of Accusation against MICHAEL THOMAS FADEEFF ("Respondent"), is informed and
18	alleges as follows:
19	1
20	Respondent is presently licensed and/or has license rights under the Real Estate
21	Law, Part 1 of Division 4 of the Business and Professions Code ("Code"), as a real estate
22	salesperson, License No.01305454, whose license expires on February 5, 2022.
23	CRIMINAL CONVICTION
24	2
25	On or about February 7, 2020, in the Superior Court of California, County of
26	Contra Costa, Case No. 1-186580-7, Respondent was convicted of violating California Penal
27	Code Section 646.9(a) (stalking), a felony and a crime that bears a substantial relationship to

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1	the qualifications, functions, or duties of a real estate licensee pursuant to Section 2910, Title
2	10, California Code of Regulations ("Regulations"); and California Penal Code Section
3	30605(a) (illegal possession any assault weapon), a felony and a crime that bears a substantial
4	relationship to the qualifications, functions, or duties of a real estate licensee pursuant to
5	Section 2910, Title 10, of the Regulations.
6	FAILURE TO DISCLOSE
7	3
8	A diligent search was made of the records of the Department for Respondent's
9	license and no record or written notice was received from Respondent notifying the
10	Department within thirty days of the conviction for the crimes described above in Paragraph 2.
11	GROUNDS FOR DISCIPLINE
12	4
13	The facts alleged in Paragraph 2, above, constitute cause under Sections 490
14	(conviction of crime) and 10177(b) (conviction of crime) of the Code for the suspension or
15	revocation of all licenses and license rights of Respondent under the Real Estate Law.
16	5
17	The facts alleged in Paragraph 3, above, constitute cause under Sections 10186.2
18	(reporting requirements) and 10177(d) (willful disregard of Real Estate Law) of the Code for
19	suspension or revocation of all licenses and license rights of Respondent under the Real Estate
20	Law.
21	COST RECOVERY
22	6
23	Section 10106 of the Code provides, in pertinent part, that in any order issued in
24	resolution of a disciplinary proceeding before the Department, the Commissioner may request
25	the administrative law judge to direct a licensee found to have committed a violation of this
26 27	part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the
21 	case.
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1	WHEREFORE, Complainant prays that a hearing be conducted on the
2	allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3	disciplinary action against all licenses and license rights of Respondent under the Code, and for
4	such other and further relief, including reasonable investigation and enforcement costs, as may
5	be proper under the provisions of law.
6	Angre h
7	STEPHANIE YEE Supervising Special Investigator
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9	Dated at Oakland, California,
10	this 3rd day of, 2021.
11	
12	DISCOVERY DEMAND
13	Pursuant to sections 11507.6, et seq. of the Administrative Procedure Act, the
14	Department hereby makes demand for discovery pursuant to the guidelines set forth in the
15	Administrative Procedure Act. Failure to provide Discovery to the Department may result in the
16	exclusion of witnesses and documents at the hearing or other sanctions that the Office of
17	Administrative Hearings deems appropriate.
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