

1 (Regulations), to the qualifications, functions or duties of a real estate licensee. On March 30,
2 2020, the Court of Appeal of the State of California, Sixth Appellate District, affirmed the
3 judgment of conviction.

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5 The facts alleged above, in Paragraph 2, constitute grounds under Sections 490
6 (Conviction of Crime) and 10177 (b) (Conviction of Crime) of the Code for suspension or
7 revocation of all licenses and license rights of Respondent under the Real Estate Law.

8 COST RECOVERY

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10 Section 10106 of the Code provides, in pertinent part, that in any order issued in
11 resolution of a disciplinary proceeding before the Department, the Commissioner may request
12 the Administrative Law Judge to direct a licensee found to have committed a violation of this
13 part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the
14 case.

15 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
16 of this Accusation and that upon proof thereof, a decision be rendered revoking all licenses and
17 license rights of Respondent under the Real Estate Law, for the cost of investigation and
18 enforcement as permitted by law, and for such other and further relief as may be proper under
19 other provisions of law.

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21 
22 STEPHANIE YEE
23 Supervising Special Investigator

24 Dated at Oakland, California, on
25 this 18th day of March, 2022.

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DISCOVERY DEMAND

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