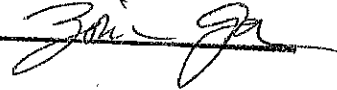


1 JUDITH B. VASAN, Counsel (SBN 278115)  
2 Bureau of Real Estate  
3 320 West 4th Street, Suite 350  
4 Los Angeles, California 90013-1105  
5 Telephone: (213) 576-6982  
6 (Direct) (213) 576-6904

**FILED**

JUN - 6 2016

BUREAU OF REAL ESTATE

By 

7  
8 BEFORE THE BUREAU OF REAL ESTATE  
9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of ) No. H-40270 LA  
12 )  
13 ANGELO GABRIEL NAEMI, ) ACCUSATION  
14 )  
15 Respondent. )

16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the  
17 State of California, for cause of Accusation against ANGELO GABRIEL NAEMI  
18 (“Respondent”), alleges as follows:

19 1.

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

22 2.

23 Respondent presently has license rights under the Real Estate Law, Part 1 of  
24 Division 4 of the California Business and Professions Code (“Code”), as a real estate  
25 salesperson.

26 ///

27 ///

ACCUSATION OF  
ANGELO GABRIEL NAEMI

1 (CRIMINAL CONVICTION)

2 3.

3 On or about November 6, 2014, in the Superior Court of California, County of  
4 Santa Barbara, Case No. 1453657, Respondent pled *nolo contendere* to and was convicted for  
5 violation of California Penal Code Section 273.5(a) (corporal injury to cohabitant), a felony.  
6 Respondent was placed on supervised probation for 5 years and ordered to serve 120 days in  
7 county jail and to pay various fines and fees. In addition, Respondent was ordered to complete  
8 a one-year batterer's intervention program and 20 hours of public service work. This conviction  
9 bears a substantial relationship under Section 2910, Title 10, Chapter 6, California Code of  
10 Regulations to the qualifications, functions or duties of a real estate licensee.

11 4.

12 The crime of which Respondent was convicted, as described in Paragraph 3  
13 above, constitutes cause under Sections 490 and 10177(b) of the Code for the suspension or  
14 revocation of the license and license rights of Respondent under the Real Estate Law.

15 (FAILURE TO REPORT CONVICTION)

16 5.

17 Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, "the  
18 conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any  
19 felony or misdemeanor" to the Bureau within 30 days of the conviction. Respondent failed to  
20 report in writing to the Bureau the conviction described in Paragraph 3 above, within thirty (30)  
21 days of the conviction date.

22 6.

23 Respondent's failure to timely report the conviction described in Paragraph 3,  
24 above, constitutes cause under Section 10186.2 of the Code for the suspension or revocation of  
25 the license and license rights of Respondent under the Real Estate Law.

26 ///

27 ///

1 (COSTS OF INVESTIGATION AND ENFORCEMENT)

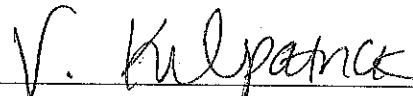
2 7.

3 California Business and Professions Code Section 10106, provides, in pertinent  
4 part, that in any order issued in resolution of a disciplinary proceeding before the Bureau of  
5 Real Estate, the Commissioner may request the administrative law judge to direct a licensee  
6 found to have committed a violation of this part to pay a sum not to exceed the reasonable costs  
7 of the investigation and enforcement of the case.

8 WHEREFORE, Complainant prays that a hearing be conducted on the  
9 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing  
10 disciplinary action against all the licenses and license rights of Respondent ANGELO  
11 GABRIEL NAEMI under the Real Estate Law for the cost of investigation and enforcement as  
12 permitted by law, and for such other and further relief as may be proper under other applicable  
13 provisions of law.

14  
15 Dated at San Diego, California

16 this 26<sup>th</sup> day of May, 2016

17  
18  
19   
20 Veronica Kilpatrick  
21 Supervising Special Investigator

22  
23  
24  
25 cc: ANGELO GABRIEL NAEMI  
26 CornerStone Central Coast Real Estate, Inc.  
27 Veronica Kilpatrick  
Sacto.

ACCUSATION OF  
ANGELO GABRIEL NAEMI