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FILED

SEP 25 2020

DEPT. OF REAL ESTATE

By *[Signature]*

9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-41788 LA
13 RICHARD CLAUDE CHANDROO,) ACCUSATION
14 Respondent.)
15)

16 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
17 of California, for cause of Accusation against RICHARD CLAUDE CHANDROO
18 ("Respondent") alleges as follows:

19 1.

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

22 2.

23 All references to the "Code" are to the California Business and Professions Code
24 and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

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1 LICENSE HISTORY

2 3.

3 a. Respondent has license rights under the Real Estate Law, Part 1 of Division 4
4 of the California Business and Professions Code, as a real estate salesperson ("RES"),
5 Department of Real Estate¹ ("Department") license ID 01937737.

6 b. The Department originally issued Respondent's RES license on or about
7 September 15, 2014.

8 c. Respondent's RES license is scheduled to expire on September 14, 2022,
9 unless renewed.

10 CAUSE FOR DISCIPLINE

11 (CRIMINAL CONVICTION)

12 4.

13 August 7, 2019; Penal Code ("PC") Section 459 - Felony

14 a. On or about January 25, 2019, in the Superior Court of California, San
15 Bernardino County, in Case No. FWV19000271, The People of the State of California v.
16 Richard Claude Chandroo, a felony complaint was filed against Respondent for violations of
17 PC Section 459 (burglary), a felony, and Vehicle Code Section 10851(a) (taking vehicle
18 without owner's consent/vehicle theft), a felony.

19 b. On or about May 13, 2019, Respondent pled no contest to and was convicted
20 of violation of PC Section 459 (burglary), a felony.

21 b. Also on or about May 13, 2019, the Court suspended the imposition of
22 sentence and placed Respondent on formal probation for 36 months under certain terms and
23 conditions, including, in part, attend Narcotics Anonymous/Alcoholics Anonymous meetings,
24 assigned to Mental Health Court, attend alcohol and drug treatment program, attend
25 STAR/FACT Mental Health Rehabilitation Program, and payment of fines and fees.

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27 ¹ Between July 1, 2013 and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate under the Department of Consumer Affairs.

1 5.

2 (IN AGGRAVATION)

3 September 27, 2011; Vehicle Code ("VC") Sections 23152(a) and (b) - Misdemeanors

4 a. On or about September 27, 2011, in the Superior Court of California, San
5 Bernardino County, in Case No. **TCH1000826**, The People of the State of California v. Richard
6 Chandroo, Respondent pled no contest to and was convicted of violation of VC Section
7 23152(a) (driving under the influence of alcohol), a misdemeanor, and VC Section 23152(b)
8 (driving under the influence of having blood alcohol level of 0.08% or more), a misdemeanor.

9 b. Also on or about September 27, 2011, the Court suspended the imposition of
10 sentence and placed Respondent on summary probation for 36 months under certain terms and
11 conditions, including, in part, 180 days jail, attend multiple offender alcohol program, and
12 payment of fines (18 days jail in lieu of fine).

13 c. On or about July 17, 2014, the Court ordered that both counts be dismissed
14 pursuant to PC 1203.4.

15 6.

16 November 6, 2007; VC Section 23152(b) - Misdemeanor

17 a. On or about November 6, 2007, in the Superior Court of California, San
18 Bernardino County, in Case No. **TCH700590**, The People of the State of California v. Richard
19 Chandroo, Respondent pled no contest to and was convicted of violation of VC Section
20 23152(b) (driving under the influence of having blood alcohol level of 0.08% or more), a
21 misdemeanor.

22 b. Also on or about November 6, 2007, the Court suspended the imposition of
23 sentence and placed Respondent on summary probation for 36 months under certain terms and
24 conditions, including, in part, 2 days jail, attend first offender alcohol program, and payment of
25 fines and fees.

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The crime of which Respondent was convicted, as set forth in Paragraph 4 above, by its facts and circumstances, bears substantial relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real estate licensee and constitute cause under **Code Sections 490 and 10177(b)** for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

SECOND CAUSE FOR DISCIPLINE
(FAILURE TO REPORT)

8.

Respondent did not report in writing to the Department of a felony complaint being brought against him (January 25, 2019).

9.

Respondent did not report in writing to the Department of his conviction within thirty (30) days of the conviction dates (May 13, 2019).

10.

Respondent's failure to report the felony complaint filed against him and his conviction constitutes cause for discipline under **Code Section 10186.2²** of the license and license rights of Respondent under the Real Estate Law.

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² Pursuant to Business and Professions Code 10186.2: (a)(1) A licensee shall report any of the following to the department: (A) The bringing of an indictment or information charging a felony against the licensee. (B) The conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any felony or misdemeanor. (c) Any disciplinary action taken by another licensing entity or authority of this state or of another state or an agency of the federal government. (2)The report required by this subdivision shall be made in writing within 30 days of the date of the bringing of the indictment or the charging of a felony, the conviction, or the disciplinary action. (b) Failure to make a report required by this section shall constitute a cause for discipline.

1 COSTS


2 11.

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

7 PRAYER

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 licenses and/or license rights under the Real Estate Law (Part 1 of
11 Division 4 of the California Business and Professions Code) of Respondent RICHARD
12 CLAUDE CHANDROO, for the cost of investigation and enforcement as permitted by law, and
13 for such other and further relief as may be proper under applicable provisions of law.

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15 Dated at Los Angeles, California this 21st day of September, 2020.

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19 Maria Suarez
Supervising Special Investigator

20 cc: RICHARD CLAUDE CHANDROO
21 Maria Suarez
22 Sacto.
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