STEVE CHU, Counsel (SBN 238155) 1 JAN 2 6 2023 Department of Real Estate 2 320 West 4th Street, Suite 350 Los Angeles, California 90013-1105 3 Telephone: (213) 620-6430 4 (213) 576-6917 Fax: 5 6 7 8 BEFORE THE DEPARTMENT OF REAL ESTATE 9 STATE OF CALIFORNIA 10 11 In the Matter of the Accusation of No. H-42507 LA 12 13 EURYDICE C PRINCE-TURK, **ACCUSATION** 14 Respondent. 15 The Complainant, Jason Parson, a Supervising Special Investigator of the State 16 of California, for cause of Accusation against EURYDICE C PRINCE-TURK, 17 a.k.a. EURYDICE C PRINCETURK, a.k.a. EURYDICE PRINCE, a.k.a. EURYDICE 18 CANDIDA PRINCETURK, a.k.a. EURYDICE PRINCETURK, a.k.a. EURYDICE 19 CANIDIDA PRINCE TURK ("Respondent"), is informed and alleges as follows: 20 1. 21 The Complainant, Jason Parson, acting in his official capacity as a Supervising 22 Special Investigator of the State of California, makes this Accusation against 23 EURYDICE C PRINCE-TURK. 24 2. 25 Respondent presently has license rights under the Real Estate Law, Part 1 of 26 Division 4 of the California Business and Professions Code ("Code"), as a real estate broker. 27

Accusation of Eurydice C Prince-Turk

FIRST CAUSE OF ACTION (CRIMINAL CONVICTION)

3.

In aggravation, on or about September 20, 2017, Respondent pled no contest and was convicted in the Superior Court of California, County of San Bernardino, Case

No. MWV17013322, for violation of California Vehicle Code section 23103(a) (Reckless

Driving), a misdemeanor. Respondent was placed on 36 months of summary probation, and ordered to pay fines and fees. Additionally, Respondent was ordered to complete a wet reckless program.

4.

On or about August 17, 2021, Respondent pled no contest and was convicted in the Superior Court of California, County of San Bernardino, Case No. FWV20002711-1, for violation of California Penal Code section 646.9(a) (Stalking), a felony. Respondent was placed on two years of felony probation, and ordered to serve 726 days in jail and pay restitution, fines and fees.

5.

The conviction described in Paragraph 4 bears a substantial relationship under section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real estate licensee.

6.

The crime of which Respondent was convicted, as described in Paragraph 4 above, constitutes cause under sections 490 and 10177(b)(1) of the Code for the suspension or revocation of all the licenses and license rights of Respondent under the Real Estate Law.

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Accusation of Eurydice C Prince-Turk

SECOND CAUSE OF ACTION

(FAILURE TO REPORT CONVICTION)

7.

Pursuant to Code section 10186.2, a licensee shall report, in writing, "the conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any felony or misdemeanor" to the Department of Real Estate ("Department") within 30 days of the conviction. Respondent failed to report in writing to the Department the conviction described in Paragraph 4 above, within thirty (30) days of the conviction date (August 17, 2021). Respondent's failure to timely report the convictions constitutes cause under section 10186.2 of the Code for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

Code section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department of Real Estate, 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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Accusation of Eurydice C Prince-Turk

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 the licenses, license endorsements, and license rights of Respondent EURYDICE C PRINCE-TURK under the Real Estate Law, for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California

this 23rd day of January , 20 23

Jason Parson

Supervising Special Investigator

cc: EURYDICE C PRINCE-TURK

Evergreen Realty Partners, Inc. DBA Community Care Real Estate; Divorce My Rental; Divorce Your Rental; OCHomz; Property Solutions; Property Solutions Management; Realty One Group; Realty One Group CA; Realty One Group California; Realty One Group West; and SoCalHomes

Jason Parson

Sacto.