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FILED

JAN 19 2022

DEPARTMENT OF REAL ESTATE
By B. Nicholas

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)
12) No. H-3427 FR
13 AARON DANIEL PERRYMAN,)
14) ACCUSATION
Respondent.)

15 The Complainant, BRENDA SMITH, acting in her official capacity as a
16 Supervising Special Investigator of the State of California, for this Accusation against AARON
17 DANIEL PERRYMAN ("Respondent"), is informed and alleges as follows:

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19 Respondent is presently licensed and/or has license rights under the Real Estate
20 Law, Part 1 of Division 4 of the California Business and Professions Code ("Code"), as a real
21 estate broker.

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23 On or about July 15, 2021, in the Superior Court of the State of California, County
24 of Fresno, Case No. M18923887, Respondent was convicted of violating Section 23152(b) (drive
25 under the influence-over .08%) of the California Vehicle Code, a misdemeanor and a crime that
26 bear a substantial relationship to the qualifications, functions or duties of a real estate licensee
27 pursuant to Section 2910, Title 10, of the California Code of Regulations ("Regulations").

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On or January 30, 2019, in the Superior Court of the State of California, County of Fresno, Case No. M18923887, Respondent was convicted of violating Section 23152(b) of the California Vehicle Code, a misdemeanor and a crime that bears a substantial relationship to the qualifications, functions or duties of a real estate licensee pursuant to Section 2910 of the Regulations.

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On or January 30, 2019, in the Superior Court of the State of California, County of Fresno, Case No. M18925040, Respondent was convicted of four counts of violating Section 273.6 (disobeying domestic relations court order) of the California Penal Code, misdemeanors and crimes that bear a substantial relationship to the qualifications, functions or duties of a real estate licensee pursuant to Section 2910 of the Regulations.

MATTERS IN AGGRAVATION

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On or about November 13, 2018, in the Superior Court of the State of California, County of Fresno, Case No. F18906832, Respondent was convicted of violating Sections 466 (possession of burglary tools), a misdemeanor, 496d(a) (buying or receiving stolen vehicle or equipment), a felony, and 664/10851(a) (attempted unlawful driving or taking of a vehicle), a felony, of the California Penal Code.

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On or about November 13, 2018, in the Superior Court of the State of California, County of Fresno, Case No. F18906514, Respondent was convicted of violating Sections 466, a misdemeanor, 496d(a), a felony, and 664 (unlawful driving or taking of a vehicle), a felony, of the California Penal Code.

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On or about November 13, 2018, in the Superior Court of the State of California, County of Fresno, Case No. M18925743, Respondent was convicted of violating Section 23152(b) of the California Vehicle Code, a misdemeanor.

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On or about September 30, 2008, in the Superior Court of the State of California, County of Fresno, Case No. M08920966, Respondent was convicted of violating Section 12500(a) (drive without a valid license) of the California Vehicle Code, a misdemeanor.

GROUNDS FOR DISCIPLINE

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The facts alleged in Paragraphs 2, 3, and 4, above, constitute cause under Sections 490 (conviction of substantially related crime) and 10177(b) (conviction of substantially related crime) of the Code for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

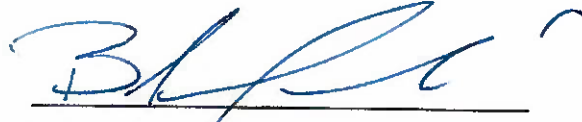
COST RECOVERY

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The Department will seek to recover the costs of the investigation and prosecution of this case pursuant to Section 10106 of the Code which provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, 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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1 WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this
2 Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action
3 against all licenses and license rights of Respondent under the Real Estate Law, for the cost of
4 investigation and enforcement as permitted by law, and for such other and further relief as may
5 be proper under other provisions of law.

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8 BRENDA SMITH

9 Supervising Special Investigator

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11 Dated at Fresno, California,
12 this 14 day of January 2022.

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15 DISCOVERY DEMAND

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