1	KYLE T. JONES, Attorney (SBN 300751)		
2	Department of Real Estate Legal Division		
3	651 Bannon Street, Suite 507		
4	Sacramento, CA 95811 MAY 0 1 2025		
5	Telephone: (916) 737-4389 (Direct) DEPARTMENT OF REAL ESTATE		
6	(916) 263-3767 (Fax) (916) 576-8700		
7			
8	BEFORE THE DEPARTMENT OF REAL ESTATE		
9	STATE OF CALIFORNIA		
10			

11	In the Matter of the Accusation of No. H-3605 FR		
12	DREW JOHN KEKOA RAHER,)		
13) <u>ACCUSATION</u> Respondent.)		
14			
15	The Complainant, RUBEN CORONADO, acting in his official capacity as a		
16	Supervising Special Investigator of the State of California, for this Accusation against DREW		
17	JOHN KEKOA RAHER ("Respondent"), is informed and alleges as follows:		
18	1		
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 salesperson.		
22	2		
23	On or about June 13, 2024, in the Superior Court of the State of California,		
24	County of San Diego, Case No. SCD295670, Respondent was convicted of violating Section		
25	245(a)(1) (assault by means likely to produce great bodily injury-personally inflicted great bodily		
26	injury) of the California Penal Code, a felony and a crime that bears a substantial relationship to		
27			

1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	

the qualifications, functions or duties of a real estate licensee pursuant to Section 2910, Title 10, Chapter 6, of the California Code of Regulations.

GROUNDS FOR DISCIPLINE

3

The facts alleged in Paragraph 2, 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

4

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.

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 licenses and license rights of Respondent 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 provisions of law.

RUBEN CORONADO Supervising Special Investigator

Dated at Fresno, California,

this 29 day of April , 2025.

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.