

JASON D. LAZARK, Counsel (SBN 263714)
Department of Real Estate
P. O. Box 187007
Sacramento, CA 95818-7007

Telephone: (916) 227-0789
Direct: (916) 227-0822
Fax: (916) 227-9458

FILED

JUN 07 2012

DEPARTMENT OF REAL ESTATE

By L. Frost

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of)	
)	No. H-4362 SD
CHAD ELLIOTT URIE,)	
)	<u>ACCUSATION</u>
Respondent.)	

The Complainant, VERONICA KILPATRICK, acting in her official capacity as a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against CHAD ELLIOTT URIE (herein "Respondent"), is informed and alleges as follows:

1.

Respondent is presently licensed and/or has license rights under the Real Estate Law Part 1 of Division 4 of the Business and Professions Code (herein "the Code") as a restricted real estate salesperson.

PRESENT CRIMINAL CONVICTION

2.

On or about January 19, 2011, in the Superior Court of the State of California, County of San Diego, Case Number M111668, Respondent was convicted of violating section 20002(a) of the Vehicle Code (hit and run), a misdemeanor which bears a substantial relationship under section 2910, title 10, California Code of the Regulations (herein "the Regulations") to the qualifications, functions or duties of a real estate licensee.

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Effective April 6, 2005, pursuant to Stipulation and Agreement between Respondent, his attorney, and the Department in Case No. H-3047 SD, Respondent was issued a restricted real estate salesperson license as a result of the conviction described below in Paragraph 4.

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On or about January 23, 2002, in the Superior Court of the State of California, County of San Diego, Respondent was convicted of violating section 23152(a) of the Vehicle Code (driving while under the influence of alcohol or drugs), a misdemeanor involving moral turpitude which bears a substantial relationship under section 2910 of the Regulations to the qualifications, functions or duties of a real estate licensee.

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The facts alleged above in Paragraph 2 constitute grounds under sections 490 and 10177(b) of the Code for suspension or revocation of all licenses and license rights of Respondent under Part 1 of Division 4 of the Code (herein “the Real Estate Law”).

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1 COST RECOVERY

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3 The Department will seek to recover cost of the investigation and prosecution of
4 this case pursuant to section 10106 of the Code which provides, in pertinent part, that in any
5 order issued in resolution of a disciplinary proceeding before the Department, the Commissioner
6 may request the Administrative Law Judge to direct a licensee found to have committed a
7 violation of this part to pay a sum not to exceed the reasonable costs of the investigation and
8 enforcement of the case.

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

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16 VERONICA KILPATRICK
17 Deputy Real Estate Commissioner
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19 Dated at San Diego, California, on
20 this 3 day of May, 2012.
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