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FILED

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BUREAU OF REAL ESTATE

By *L. Lust*

BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)	
)	H-4528 SD
ALEJANDRO ISAAC GUZMAN,)	
)	<u>ACCUSATION</u>
Respondent.)	
)	

The Complainant, VERONICA KILPATRICK, in her official capacity as a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against Respondent ALEJANDRO ISAAC GUZMAN, also known as Alejandro Guzman Jr., (hereinafter "Respondent"), is informed and alleges as follows:

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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) (hereinafter "the Code") as a real estate salesperson.

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On or about August 26, 2011, in the Superior Court of the State of California, County of San Diego, Case No. CD233231, Respondent was convicted, upon a plea of guilty, of

1 violating Section 23153(a) of the California¹ Vehicle Code (DUI, causing personal injury to
2 another), while admitting enhancements under Section 23578 of the Vehicle Code (B.A.C. of
3 0.15% or higher), and Section 1192.7(c)(8) of the Penal Code (infliction of great bodily injury to
4 another, not an accomplice), a felony and a crime which bears a substantial relationship under
5 Section 2910, Title 10 of the California Code of Regulations to the qualifications, functions, or
6 duties of a real estate licensee.

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9 The facts alleged in paragraph 2, above, constitute cause under Sections 490
10 (conviction of crime) and 10177(b) (conviction of crime substantially related to the
11 qualifications, functions or duties of a real estate licensee) of the Code, for the suspension or
12 revocation of all licenses and license rights of Respondent under the Real Estate Law.

13 COST RECOVERY
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15 4

16 Section 10106 of the Code provides, in pertinent part, that in any order issued in
17 resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the
18 administrative law judge to direct a licensee found to have committed a violation of this part to
19 pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.
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21 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
22 of this Accusation and that upon proof thereof, a decision be rendered revoking all licenses and
23 license rights of Respondent under the Real Estate Law (Part 1 of Division 4 of the Business and
24 Professions Code), for the cost of investigation and enforcement as permitted by law, and for
25 such other and further relief as may be proper under the provisions of law.

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27 ¹ All references are to California codes and regulations, unless otherwise stated.

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VERONICA KILPATRICK
Deputy Real Estate Commissioner

Dated at San Diego, California
this 14 day of October, 2013.