

FILED

JAN 26 2021

DEPT. OF REAL ESTATE

at elbow

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Department of Real Estate
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Attorney for Complainant

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation Against) No. H- 05198 SD
)
CHUTIPA PLUM PAWASITTICHOT,)
) ACCUSATION
)
Respondent.)

The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California, for cause of Accusation against CHUTIPA PLUM PAWASITTICHOT ("Respondent") alleges as follows:

1.

The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California, makes this Accusation in her official capacity.

2.

All references to the "Code" are to the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code.

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ACCUSATION

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1 REALTY, CPR INC" and "MAIL TO: 30520 RANHO CALIFORNIA RD #107-179,
2 TEMECULA, CA 92591."

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4 7.

5 Respondent is the president of Chutipa Plum Realty CPR Inc, a California
6 corporation with Corporation Number C3511764.

7 8.

8 In an e-mail dated February 5, 2018, Respondent again instructed Williams to
9 make the check payable to "CHUTIPA PLUM REALTY, CPR INC 30520 Rancho California
10 Rd #107-179 Temecula CA 92591."

11 9.

12 In an e-mail dated March 8, 2018, Respondent sent a copy of her W-9 Request
13 for Taxpayer Identification Number and Certification, dated March 6, 2018, as an attachment to
14 the e-mail to Williams. Respondent's W-9 form listed Respondent's name and "Chutipa Plum
15 Realty, CRP Inc." as the business name. Respondent reminded Williams to send the
16 commission check to the address previously provided, namely, 30520 Rancho California Road
17 #107-179.

18 10.

19 On or about March 29, 2018, Lee & Associates issued a check payable to
20 Chutipa Plum Realty in the amount of \$35,132.04. The check posted on April 4, 2018.

21 (COMPLAINT)

22 11.

23 On or about June 30, 2020, the Department of Real Estate ("Department")
24 received a complaint from Thomas, the designate officer for Respondent's responsible broker
25 from June 12, 2017, through June 17, 2020. According to Thomas, he was not made aware of
26 the Collins Avenue transaction until he received a subpoena in a pending litigation suit in or
27 about June 2020, for the transaction file for Collins Avenue. Subsequently, Thomas requested
the documents from Respondent. At no time prior to Thomas' receipt of the subpoena for

1 documents relating to Collins Avenue did Respondent inform her responsible broker of the
2 transaction or Respondent's commission.

3 12.

4 (UNLAWFUL PAYMENT OF COMPENSATION)

5 Based on the conduct, acts and/or omissions of Respondent, as described in
6 Paragraphs 4 through 11 above, Respondent accepted compensation for activity requiring a real
7 estate license from a person other than Respondent's responsible broker in violation of Code
8 section 10137.

9 (FRAUD OR DISHONEST DEALING)

10 13.

11 The conduct, acts and/or omissions of Respondent, as described in Paragraphs 6
12 through 11 above, constitute fraud or dishonest dealing and are cause for the suspension or
13 revocation of the license and license rights of Respondent under Code section 10176(i).

14 (MISREPRESENTATION)

15 14.

16 The conduct, acts and/or omissions of Respondent, as described in Paragraphs 6
17 through 11 above, constitute a substantial misrepresentation and are cause for the suspension or
18 revocation of the license and license rights of Respondent under Code section 10176(a).

19 15.

20 Each of the foregoing violations above constitutes cause for the suspension or
21 revocation of the real estate license and/or license rights of Respondent under the provisions of
22 Sections 10177(d) and/or 10177(g).

23 COSTS

24 (INVESTIGATION AND ENFORCEMENT COSTS)

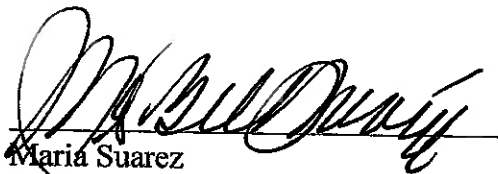
25 16.

26 Section 10106 of the Code, provides, in pertinent part, that in any order issued in
27 resolution of a disciplinary proceeding before the Department, the Commissioner may request

1 the administrative law judge to direct a licensee found to have committed a violation of this
2 part to pay a sum not to exceed the reasonable costs of investigation and enforcement of the
3 case.

4 WHEREFORE, Complainant prays that a hearing be conducted on the allegations of
5 this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary
6 action against all the licenses and/or license rights of Respondent CHUTIPA PLUM
7 PAWASITTICHOT under the Real Estate Law, for the costs of investigation and enforcement
8 as permitted by law and for such other and further relief as may be proper under other
9 applicable provisions of law.

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11 Dated at Los Angeles, California this 25th day of January, 2021.

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14 
15 Maria Suarez
16 Supervising Special Investigator
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25 cc: CHUTIPA PLUM PAWASITTICHOT
26 Real Acquisition, Inc.
27 Maria Suarez
Sacto.