

FILED

MAR 24 2021

DEPT. OF REAL ESTATE

*at Selvia*

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9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 \* \* \*

12 In the Matter of the Accusation of )

No. H-05214 SD

13 ALEXANDRA GABRIELLE COSETTI, )

ACCUSATION

14 Respondent. )

15 \_\_\_\_\_ )  
16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the  
17 State of California, for cause of Accusation against ALEXANDRA GABRIELLE COSETTI  
18 ("Respondent"), alleges as follows:

19 1.

20 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the  
21 State of California, makes this Accusation in her official capacity.

22 2.

23 Respondent presently has license rights under the Real Estate Law, Part 1 of  
24 Division 4 of the California Business and Professions Code ("Code"), as a real estate  
25 salesperson (License ID 02041395). Respondent's license is scheduled to expire on August 13,  
26 2021, unless renewed.

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1 (CRIMINAL CONVICTION)

2 3.

3 On or about April 4, 2019, in the Superior Court of California, County of  
4 Sacramento, Case No. 18FE021525, Respondent was convicted on a plea of nolo contendere  
5 for violation of Vehicle Code section 23153(b) (driving under the influence with a 0.08 percent  
6 or more blood alcohol content, causing injury), a felony. The imposition of judgment and  
7 sentence was suspended, and Respondent was placed on formal probation for five (5) years, on  
8 certain terms and conditions, including, in part, participation in alcohol and drug rehabilitations  
9 programs under the direction of the probation officer, payment of victim restitution in an  
10 amount to be determined by the probation officer, and payment of fees and a fine.

11 4.

12 The conviction, as described in Paragraph 3 above, bears a substantial  
13 relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the  
14 qualifications, functions or duties of a real estate licensee.

15 5.

16 The crime of which Respondent was convicted, as described in Paragraph 3  
17 above, constitutes cause under Sections 490 and 10177(b) of the Code for the suspension or  
18 revocation of the license and license rights of Respondent under the Real Estate Law.

19 (COSTS OF INVESTIGATION AND ENFORCEMENT)

20 6.

21 California Business and Professions Code section 10106, provides, in pertinent  
22 part, that in any order issued in resolution of a disciplinary proceeding before the Bureau of  
23 Real Estate, the Commissioner may request the administrative law judge to direct a licensee  
24 found to have committed a violation of this part to pay a sum not to exceed the reasonable costs  
25 of the investigation and enforcement of the case.

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1 WHEREFORE, Complainant prays that a hearing be conducted on the  
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing  
3 disciplinary action against all the licenses and license rights of Respondent ALEXANDRA  
4 GABRIELLE COSETTI under the Real Estate Law, for the costs of investigation and  
5 enforcement as permitted by law, and for such other and further relief as may be proper under  
6 other applicable provisions of law.

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8 Dated at San Diego, California this 10 day of March, 2021.

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11   
12 Veronica Kilpatrick  
13 Supervising Special Investigator  
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25 cc: ALEXANDRA GABRIELLE COSETTI  
26 TCGSF Inc.  
27 Veronica Kilpatrick  
Sacto.