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FILED

SEP 12 2018

DEPARTMENT OF REAL ESTATE
By L. Lopez

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)
12)
13 RICHARD YEE YOUNG,)
14 Respondent.)

No. H-6711 SAC
ACCUSATION

15 The Complainant, TRICIA D. PARKHURST, acting in her official capacity as a
16 Supervising Special Investigator of the State of California, for cause of Accusation against
17 RICHARD YEE YOUNG (Respondent), is informed and alleges as follows:

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19 At all times herein mentioned, Respondent was and is presently licensed and/or
20 has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and
21 Professions Code (the Code) by the Department of Real Estate (the Department) as a real estate
22 salesperson.

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24 On or about January 2, 2018, in the Superior Court of California, County of
25 Shasta, Case No. MCRDCRF170003362, Respondent was convicted of violating Section 23153
26 (b) of the California Vehicle Code (Driving Under the Influence Over .08% Causing Injury) with
27 the following admitted allegations:

- 1 a) Per Section 23577 of the California Vehicle Code (Refusal of Chemical Test);
- 2 and
- 3 b) Per Section 23578 of the California Vehicle code (.15% or Higher Blood
- 4 Alcohol).

5 Respondent's conviction is a misdemeanor and crime which bears a substantial relationship
6 under Section 2910, Title 10, Chapter 6, California Code of Regulations (Regulations), to the
7 qualifications, functions or duties of a real estate licensee.

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9 The facts alleged above, in Paragraph 2, constitute grounds under Sections 490
10 and 10177(b) (Conviction of a Crime) of the Code for suspension or revocation of all licenses
11 and license rights of Respondent under the Real Estate Law.

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13 COST RECOVERY

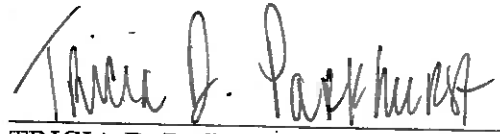
14 4

15 Section 10106 of the Code provides, in pertinent part, that in any order issued in
16 resolution of a disciplinary proceeding before the Department, the Commissioner may request
17 the Administrative Law Judge to direct a licensee found to have committed a violation of this
18 part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the
19 case.

20 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
21 of this Accusation and that upon proof thereof, a decision be rendered revoking all licenses and
22 license rights of Respondent under the Real Estate Law, for the cost of investigation and

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1 enforcement as permitted by law, and for such other and further relief as may be proper under
2 other provisions of law.

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5 TRICIA D. PARKHURST
6 Supervising Special Investigator

7 Dated at Sacramento, California, on
8 this 31st day of August, 2018.
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10 DISCOVERY DEMAND

11 Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the
12 Department hereby makes demand for discovery pursuant to the guidelines set forth in the
13 *Administrative Procedure Act*. Failure to provide Discovery to the Department may result in the
14 exclusion of witnesses and documents at the hearing or other sanctions that the Office of
15 Administrative Hearings deems appropriate.
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