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FILED

DEC 19 2018

DEPARTMENT OF REAL ESTATE

By *K. Kreeger*

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)
12 KATHRYN GAIL KREEGER,) No. H-6764 SAC
13) ACCUSATION
14 Respondent.)

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

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19 Respondent is presently licensed and/or has license rights under the Real Estate
20 Law, Part 1 of Division 4 of the California Business and Professions Code ("Code"), as a real
21 estate broker.

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23 On or about April 12, 2016, in the Superior Court of the State of California,
24 County of Placer, Case No. 62-141340, Respondent was convicted of violating Section 273a(b)
25 (child abuse-neglect or endangering health) of the California Penal Code and Section 23152(f)
26 (driving under the influence of a drug) of the California Vehicle Code, misdemeanors and crimes

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DISCOVERY DEMAND

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