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FILED

APR 17 2019

DEPARTMENT OF REAL ESTATE
By X. Krapp

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of:

12 JULIE ANN CLEVINGER,

13 Respondent.

No. H-6821 SAC

ACCUSATION

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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 JULIE ANN CLEVINGER ("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 Business and Professions Code ("the Code") as a real estate
21 salesperson.

22 CRIMINAL CONVICTION

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24 On or about May 11, 2018, in the Superior Court of the State of California,
25 County of El Dorado, Case No. P17CRF0006, Respondent was convicted of violating Welfare
26 and Institutions Code Section 10980(c)(1) (receiving public assistance by fraud), a misdemeanor
27 which bears a substantial relationship under Section 2910, Title 10, of the California Code of

1 Regulations to the qualifications, functions or duties of a real estate licensee.

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3 The facts alleged above in Paragraph 2 constitute grounds under Sections 490
4 and 10177(b) of the Code for suspension or revocation of all licenses and license rights of
5 Respondent under Part 1 of Division 4 of the Code.

6 FAILURE TO DISCLOSE FILING OF INFORMATION AND/OR CONVICTION

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8 A diligent search was made of the records of the Department of Real Estate
9 ("Department") relating to Respondent's Real Estate Salesperson License No. 01879272. As a
10 result of said search, no record was discovered having been received from Respondent notifying
11 the Department, in writing, of any conviction, information, indictment, or license disciplinary
12 action.

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14 The facts alleged above in Paragraphs 2 through 4 indicate Respondent's failure
15 to comply with Sections 10186.2(a)(1)(A), 10186.2(a)(1)(B), and 10186.2(a)(2) (failure to
16 report in writing to the Department of the bringing of an indictment or information charging a
17 felony and/or a conviction of any felony or misdemeanor against Respondent within 30 days) of
18 the Code, and constitute cause under Section 10177(d) (willful disregard or violation of the Real
19 Estate Law; Part 1 of Division 4 of the Code) for revocation of all licenses and license rights of
20 Respondent under said Real Estate Law.

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22 The Department will seek to recover costs of the investigation and prosecution of
23 this case pursuant to Section 10106 of the Code which provides, in pertinent part, that in any
24 order issued in resolution of a disciplinary proceeding before the Department, the Commissioner
25 may request the administrative law judge to direct a licensee found to have committed a violation
26 of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement
27 of the case.

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

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8 TRICIA D. PARKHURST
9 Supervising Special Investigator
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11 Dated at Sacramento, California, on
12 this 12th day of April, 2019.
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