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**FILED**

**MAY 13 2020**

**DEPARTMENT OF REAL ESTATE**  
By B. Nicholas

9 **BEFORE THE DEPARTMENT OF REAL ESTATE**  
10 **STATE OF CALIFORNIA**

11 \* \* \*

12 In the Matter of the Accusation of  
13 IAN D. WHITE,

14 Respondent.

)  
) No. H- 6951 SAC  
) ACCUSATION  
)

15 The Complainant, TRICIA D. PARKHURST, in her official capacity as a  
16 Supervising Special Investigator of the Department of Real Estate ("Department") of the State of  
17 California, brings this Accusation against Respondent IAN D. WHITE ("Respondent"), and is  
18 informed and alleges as follows:

19 1


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

23 2

24 On or about June 3, 2019, in the Superior Court of the State of California, County  
25 of Napa, Case No. 19CR000779, Respondent was convicted of violating Section 23152(b)  
26 (driving under the influence with blood alcohol level over .15%) of the California Vehicle Code  
27 and Section 69 (obstruct/resist executive officer) of the California Penal Code, a crime which



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 licenses and license rights of Respondent under the Code, for the  
4 cost of investigation and enforcement as permitted by law, and for such other and further relief  
5 as may be proper under the provisions of law.

6  
7   
8 TRICIA D. PARKHURST  
9 Supervising Special Investigator

10 Dated at Sacramento, California,  
11 this 11<sup>th</sup> day of May, 2020

12  
13  
14 DISCOVERY DEMAND

15  
16 Pursuant to Sections 11507.6, *et seq.* of the *Government Code*, the Department of Real Estate  
17 hereby makes demand for discovery pursuant to the guidelines set forth in the *Administrative*  
18 *Procedure Act*. Failure to provide Discovery to the Department of Real Estate may result in the  
19 exclusion of witnesses and documents at the hearing or other sanctions that the Office of  
20 Administrative Hearings deems appropriate.