1	TRULY SUGHRUE, Counsel
2	State Bar No. 223266
3	Department of Real Estate P.O. Box 137007 Sacramento, CA 95813-7007
4	Telephone: (916) 576-8700 MAY 1 3 2020
5	(916) 576-7847 (Direct) (916) 263-3767 DEPARTMENT OF REAL ESTATE By (1/44)
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8	BEFORE THE DEPARTMENT OF REAL ESTATE
9	STATE OF CALIFORNIA
10	* * *
11	In the Matter of the Accusation of
12) 140. H- 0931 SAC
13	IAN D. WHITE, ACCUSATION
14	Respondent.)
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:
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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.
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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
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bears a substantial relationship under Section 2910, Title 10, of the California Code of 1 2 Regulations (Regulations) to the qualifications, functions or duties of a real estate licensee. 3 4 At no time did Respondent provide notice of the bringing of an indictment, the 5 charging of a felony, the conviction of Respondent of one or more misdemeanor and/or felony convictions, and/or any disciplinary action taken by another licensing agency, as required by 6 7 Section 10186.2 of the Code. 8 **GROUNDS FOR DISCIPLINE** 9 4 10 The facts identified in paragraph 2, constitutes cause under Sections 490 and 10177(b) of the Code, for the suspension or revocation of all licenses and license rights of 11 12 Respondent under the Real Estate Law. 13 5 14 The facts alleged in paragraphs 2 through 3 constitute cause under Sections 10177(d) and 10186.2 of the Code for suspension or revocation of Respondent's license under 15 16 the Real Estate Law. 17 **COST RECOVERY** 18 6 Section 10106 of the Code provides, in pertinent part, that in any order issued in 19 resolution of a disciplinary proceeding before the Department, the Commissioner may request 20 the Administrative Law Judge to direct a licensee found to have committed a violation of this 21 part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the 22 case. 23 ///24 25 26

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•	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.
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7	TRICIAD PARKINDE
8	Supervising Special Investigator
9	Dated at Sacramento, California,
10	this, 2020
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15	DISCOVERY DEMAND
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.
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