

FILED

FEB 05 2021

DEPARTMENT OF REAL ESTATE  
By: *J. Taggart*

1 KYLE T. JONES, Counsel (SBN 300751)  
2 Department of Real Estate  
3 P.O. BOX 137007  
4 Sacramento, CA 95813-7007  
5 Telephone: (916) 576-8700  
6 (916) 263-3767 (Fax)  
7 (916) 576-7840 (Direct)

8 BEFORE THE DEPARTMENT OF REAL ESTATE  
9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of )  
12 ) No. H-7007 SAC  
13 RUBEN G. VENEGAS, )  
14 Respondent. ) ACCUSATION

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 RUBEN  
17 G. VENEGAS ("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  
21 restricted real estate salesperson.

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23 On or about July 10, 2020, in the Superior Court of the State of California, County  
24 of Kern, Case No. BM942375A, Respondent was convicted of violating Section 23152(a)  
25 (driving under the influence) of the California Vehicle Code, a misdemeanor and a crime that

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1 bears a substantial relationship to the qualifications, functions or duties of a real estate licensee  
2 pursuant to Section 2910, Title 10, of the California Code of Regulations.

3 MATTERS IN AGGRAVATION

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5 Effective September 7, 2011, in Case No. H-5525 SAC, before the Department of  
6 Real Estate, Respondent's license was revoked but he was granted a right to apply for a restricted  
7 real estate license through a Stipulation and Agreement.

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9 Effective September 28, 2007, in Case No. H-4836 SAC, before the Department  
10 of Real Estate, Respondent's application for a real estate salesperson license was denied but he  
11 was granted a restricted real estate license through a Stipulation and Waiver.

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13 On or about June 19, 1998, in the Superior Court of the State of California,  
14 County of Monterey, Case No. MS165369, Respondent was convicted of violating Section  
15 14601.5(a) (driving with a suspended license) of the California Vehicle Code, a misdemeanor.

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17 On or about January 29, 1998, in the Superior Court of the State of California,  
18 County of Monterey, Case No. MS162733, Respondent was convicted of violating Section  
19 23152(a) of the California Vehicle Code, a misdemeanor.

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21 On or about February 4, 1997, in the Superior Court of the State of California,  
22 County of Monterey, Case No. MS150164, Respondent was convicted of violating Section  
23 14601.5(a) of the California Vehicle Code, a misdemeanor.

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25 On or about August 2, 1996, in the Superior Court of the State of California,  
26 County of Monterey, Case No. MS146584, Respondent was convicted of violating Section  
27 23103.5 (reckless driving involving alcohol) of the California Vehicle Code, a misdemeanor.



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DISCOVERY DEMAND

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.