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FILED
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DEPARTMENT OF REAL ESTATE
By J. Taggart

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)
12) No. H-7192 SAC
13 ANDRE F. JIMENEZ,)
14) ACCUSATION
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 ANDRE
17 F. JIMENEZ ("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 salesperson.

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23 On or about May 9, 2022, in the Superior Court of the State of California, County
24 of Sacramento, Case No. 21FE013931, Respondent was convicted of violating Section 25100(c)
25 (criminal storage of a firearm) of the California Penal Code, a misdemeanor and a crime that
26 bears a substantial relationship to the qualifications, functions or duties of a real estate licensee
27 pursuant to Section 2910, Title 10, of the California Code of Regulations.

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.