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**FILED**

**APR 14 2023**

DEPARTMENT OF REAL ESTATE  
By B. Nicholas

8 BEFORE THE DEPARTMENT OF REAL ESTATE  
9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of: )

12 CHUKWUNONSO OBINNA IFYEFOBI, )

13 Respondent. )

No. H-7216 SAC

ACCUSATION

14 The Complainant, TRICIA D. PARKHURST, acting in her official capacity as a  
15 Supervising Special Investigator of the State of California, for cause of Accusation against  
16 CHUKWUNONSO OBINNA IFYEFOBI ("Respondent"), is informed and alleges as follows:

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

21 CRIMINAL CONVICTIONS

22 2

23 On or about June 1, 2022, in the Superior Court of the State of California,  
24 County of Sacramento, Case No. 21M013460, Respondent was convicted of violating Vehicle  
25 Code Sections 20002(a) (hit and run), and 23103.5 (wet and reckless driving), misdemeanors

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1 which bear a substantial relationship under Section 2910, Title 10, California Code of  
2 Regulations ("the Regulations") to the qualifications, functions, or duties of a real estate  
3 licensee.

4 3

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

8 FAILURE TO DISCLOSE FILING OF INDICTMENT AND/OR CONVICTIONS

9 4

10 A diligent search was made of the records of the Department of Real Estate  
11 ("Department") relating to Respondent's Real Estate Salesperson License No. 02129965. As a  
12 result of said search, no record was discovered having been received from Respondent notifying  
13 the Department, in writing, of any conviction, or the bringing of any complaint, information, or  
14 indictment related to Paragraph 2, above.

15 5

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

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1 COST RECOVERY

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

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

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15 TRICIA D. PARKHURST  
16 Supervising Special Investigator

17 Dated at Sacramento, California, on  
18 this 10<sup>th</sup> day of April, 2023.

19  
20 DISCOVERY DEMAND

21 Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the  
22 Department hereby makes demand for discovery pursuant to the guidelines set forth in the  
23 *Administrative Procedure Act*. Failure to provide Discovery to the Department may result in the  
24 exclusion of witnesses and documents at the hearing or other sanctions that the Office of  
25 Administrative Hearings deems appropriate.