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FILED

JUN 19 2024

DEPARTMENT OF REAL ESTATE

By B. Nichols

9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of

13 LIBERTY SELA ROSE MAFI,

14 Respondent.

No. H- 7345 SAC

ACCUSATION

15 The Complainant, HEATHER NISHIMURA, 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 LIBERTY SELA ROSE MAFI
18 (“Respondent”), and is 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, License ID 02173840.

23 Respondent was licensed by the Department as a real estate salesperson on or
24 about April 28, 2022. Unless renewed Respondent’s real estate salesperson license expires April
25 27, 2026.

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On or about January 26, 2024, in the Superior Court of the State of California, County of Sacramento, Case No. 23FE008064, Respondent was convicted of a violation of Section 192(c)(1) (vehicular manslaughter with gross negligence) of the California Penal Code, a felony and crime which bears a substantial relationship under Section 2910, Title 10, Chapter 6, of the California Code of Regulations (“Regulations”) to the qualifications, functions or duties of a real estate licensee.

GROUND FOR DISCIPLINE

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The facts identified in paragraph 2 constitute cause under Sections 490 and 10177(b) of the Code, for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

COST RECOVERY

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Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, the Commissioner may request the Administrative Law Judge to direct a licensee found to have committed a violation of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all licenses and license rights of Respondent under the Code, for the cost of

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1 investigation and enforcement as permitted by law, and for such other and further relief as may
2 be proper under the provisions of law.

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7 HEATHER NISHIMURA
8 Supervising Special Investigator

9 Dated at Sacramento, California,
10 this 5th day of June, 2024

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12 DISCOVERY DEMAND

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