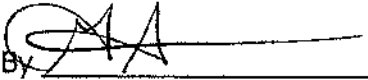


FILED

September 25, 2012

RICHARD K. UNO, Counsel (SBN 98275)
Department of Real Estate
P. O. Box 187007
Sacramento, CA 95818-7007

DEPARTMENT OF REAL ESTATE

By 

Telephone: (916) 227-0789
(916) 227-2380 (Direct)

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of)	
)	H-11463 SF
MATTHEW CHRISTOPHER WERSEL,)	
)	<u>ACCUSATION</u>
Respondent.)	
)	

The Complainant, ROBIN S. TANNER, a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against MATTHEW CHRISTOPHER WERSEL, (Respondent), is informed and alleges as follows:

1

Complainant makes this Accusation against Respondent in her official capacity.

2

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

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2 On or about June 7, 2011, in the Superior Court of the State of California, County
3 of Santa Clara, Case No. C 1101090, Respondent was convicted of violating Section 23152(b) of
4 the California Vehicle Code (Driving Under the Influence of Alcohol or a Drug), and Section
5 20002(a) of the California Vehicle Code (Hit & Run/Property Damage), both misdemeanors and
6 crimes which bear a substantial relationship under Section 2910, Title 10, California Code of
7 Regulations, to the qualifications, functions, or duties of a real estate licensee.

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9 MATTERS IN AGGRAVATION

10 On or about May 3, 2000, in the Superior Court of the State of California, County
11 of Los Angeles, Case No. 0MA0800, Respondent was convicted of violating Section 23152(a) of
12 the California Vehicle Code (Driving Under the Influence of Alcohol or a Drug), a misdemeanor.

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14 The facts alleged in Paragraphs 3 and 4, above, constitute cause under Section
15 10177(b) (Further Grounds for Disciplinary Action-Conviction of Crime) and Section 490
16 (Conviction Substantially Related Crime) of the Code for suspension or revocation of
17 Respondent's license under the Real Estate Law.

18 6

19 Section 10106 of the Code provides, in pertinent part, that in any order issued in
20 resolution of a disciplinary proceeding before the department, the commissioner may request the
21 administrative law judge to direct a licensee found to have committed a violation of this part to
22 pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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1 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
2 of this Accusation and that upon proof thereof, a Decision be rendered imposing disciplinary
3 action against all licenses and license rights of Respondent under the Code, for the reasonable
4 costs of investigation and prosecution of this case, including agency attorney's fees and for such
5 other and further relief as may be proper under provisions of law.

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8 ROBIN S. TANNER
9 Deputy Real Estate Commissioner

10 Dated at Oakland, California

11 this 15th day of September, 2012.
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