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FILED

SEP 01 2020

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 CHARLES CLAIBORNE KELLUM,) No. H-12480 SF
13 Respondent.) ACCUSATION
14)

15 The Complainant, ROBIN S. TANNER, acting in her official capacity as a
16 Supervising Special Investigator of the State of California, for this Accusation against
17 CHARLES CLAIBORNE KELLUM ("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 broker.

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23 On or about August 24, 2018, in the Superior Court of the State of California,
24 County of San Mateo, Case No. 17-NF-014662-A, Respondent was convicted of violating
25 Section 11360(a)(3) (unlawful transportation of marijuana for sale) of the California Health and
26 Safety Code, a felony and a crime that bears a substantial relationship to the qualifications,

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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 Real Estate Law, for the
4 cost of investigation and enforcement as permitted by law, and for such other and further relief as
5 may be proper under other provisions of law.

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7 ROBIN S. TANNER
8 Supervising Special Investigator
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10 Dated at Oakland, California,
11 this 19th day of August, 2020.
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18 DISCOVERY DEMAND

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