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FILED

NOV 18 2020

DEPARTMENT OF REAL ESTATE

By Y. L. Liao

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)
12 ABELINA FIERRO CASTILLO,) No. H- 12492 SF
13 Respondent.) ACCUSATION
14)

15 The Complainant, STEPHANIE YEE, acting in her official capacity as a
16 Supervising Special Investigator of the State of California, for cause of Accusation against
17 ABELINA FIERRO CASTILLO (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 Business and Professions Code (Code) as a real estate
21 salesperson.

22 2

23 On or about June 26, 2018 in the Superior Court of the State of California,
24 County of Santa Clara, Case No. C1780969, Respondent was convicted of violating Section
25 273.5 (A) of the California Penal Code (inflict corp. injury spouse) a misdemeanor and a crime
26 which bears a substantial relationship under Section 2910, Title 10, of the California Code of
27 Regulations to the qualifications, functions or duties of a real estate licensee.

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

5 4

6 A diligent search was made of the records of the Department of Real Estate
7 (Department), relating to Respondent's Real Estate Salesperson License. As a result of said
8 search, no record was discovered having been received from Respondent notifying the
9 Department, in writing, of any arrest, conviction, indictment, or license disciplinary action.

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11 The facts alleged above, in Paragraphs 2 and 4, constitute violations of Section
12 10186.2 (failure to report in writing, a conviction within 30 days) of the Code and are grounds
13 for revocation of all licenses and license rights of Respondent under Section 10177(d) of the
14 Code.

15 6

16 The Department will seek to recover costs of the investigation and prosecution of
17 this case pursuant to Section 10106 of the Code which provides, in pertinent part, that in any
18 order issued in resolution of a disciplinary proceeding before the Department, the Commissioner
19 may request the Administrative Law Judge to direct a licensee found to have committed a
20 violation of this part to pay a sum not to exceed the reasonable costs of the investigation and
21 enforcement of the case.

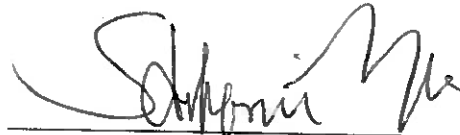
22 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
23 of this Accusation and that, upon proof thereof, a decision be rendered revoking all licenses and
24 license rights of Respondent under the Real Estate Law, for the cost of investigation and

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

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6 STEPHANIE YEE
7 Supervising Special Investigator

8 Dated at Oakland, California, on
9 this 12th day of October, 2020.

10 DISCOVERY DEMAND

11 The Department of Real Estate hereby requests discovery pursuant to Section
12 11507.6 of the California Government Code. Failure to provide discovery to the Department
13 may result in the exclusion of witnesses and/or documents at the hearing and other sanctions as
14 the Administrative Law Judge deems appropriate.