· _ ·	
× 1	KVIET IONES Comment (ODM 200751)
2	KYLE T. JONES, Counsel (SBN 300751)FILEDDepartment of Real EstateFILED
3	P.O. BOX 137007 Sacramento, CA 95813-7007 FEB 1 2 2021
4	DEPADTMENT OF DEAL FOTATE
5	Telephone: (916) 576-8700 (916) 263-3767 (Fax)
6	(916) 576-7840 (Direct)
7	
8	PEEODE THE DEPARTMENT OF DEAL FOR LTD
9	BEFORE THE DEPARTMENT OF REAL ESTATE
10	STATE OF CALIFORNIA
11	* * *
12	In the Matter of the Accusation of) No. H-12517 SF
12	CHRISTOPHER JAMES TUMAMAIT,
13	Respondent.
15)
15	The Complainant, STEPHANIE YEE, acting in her official capacity as a
17	Supervising Special Investigator of the State of California, for this Accusation against
18	CHRISTOPHER JAMES TUMAMAIT ("Respondent"), is informed and alleges as follows:
19	1 Respondent is progently liesened and (as here lies in the start of the start)
20	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 estate salesperson.
22	
22	$\frac{2}{2}$
23	On or about April 13, 2018, in the Superior Court of the State of California, County of Sonoma Case No. SCR 712238-1 Respondent was convicted of violating Section 240
25	County of Sonoma, Case No. SCR 712238-1, Respondent was convicted of violating Section 240 (assault) of the California Penal Code, a misdemeanor and a crime that been a cubatential
26	(assault) of the California Penal Code, a misdemeanor and a crime that bears a substantial
20	relationship to the qualifications, functions or duties of a real estate licensee pursuant to Section 2910, Title 10, of the California Code of Regulations.
	1

		÷.
1	GROUNDS FOR DISCIPLINE	
2	3	
3	The facts alleged in Paragraph 2, above, constitute cause under Sections 490	
4	(conviction of substantially related crime) and 10177(b) (conviction of substantially related	
5	crime) of the Code for the suspension or revocation of all licenses and license rights of	
6	Respondent under the Real Estate Law.	
7	COST RECOVERY	
8	4	
9	The Department will seek to recover the costs of the investigation and prosecution	
10	of this case pursuant to Section 10106 of the Code which provides, in pertinent part, that in any	
11	order issued in resolution of a disciplinary proceeding before the Department, the Commissioner	
12	may request the administrative law judge to direct a licensee found to have committed a violation	
13	of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement	
14	of the case.	
15	WHEREFORE, Complainant prays that a hearing be conducted on the allegations	
16	of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary	
17	action against all licenses and license rights of Respondent under the Real Estate Law, for the	
18	cost of investigation and enforcement as permitted by law, and for such other and further relief as	
19	may be proper under other provisions of law.	:
20		
21	STEPHIANIE VIE	
22	STEPHANIE YEE Supervising Special Investigator	
23		
24	Dated at Oakland, California,	
25	this 8th day of February 2021.	
26	×	
27		

I

Ш

DISCOVERY DEMAND

. 1	DISCOVERY DEMAND
2	
- 3	Pursuant to Sections 11507.6, et seq. of the Administrative Procedure Act, the
4	Department hereby makes demand for discovery pursuant to the guidelines set forth in the Administrative Proceedure Act. Evilues to energial Discovery pursuant to the guidelines set forth in the
5	Administrative Procedure Act. Failure to provide Discovery to the Department may result in the exclusion of witnesses and documents at the hearing or other sanctions that the Office of
6	Administrative Hearings deems appropriate.
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
	3