

1 Chapter 6, California Code of Regulations (Regulations), to the qualifications, functions or
2 duties of a real estate licensee.

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4 A diligent search was made of the records of the Department, relating to
5 Respondent's real estate salesperson license No. 01925322. As a result of said search, no
6 written record was discovered of Respondent notifying the Department of any conviction.

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8 The facts alleged above, in Paragraph 2, constitute grounds under Sections 490
9 (Conviction of Crime) and 10177 (b) (Conviction of Crime) of the Code for suspension or
10 revocation of all licenses and license rights of Respondent under the Real Estate Law.

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12 The facts alleged above, in Paragraph 3, constitute a violation of Section 10186.2
13 (a)(1)(B) and Section 10186.2 (a)(2) (Failure to Report in Writing of Conviction within 30
14 Days) of the Code, and are grounds for the suspension or revocation of all licenses and license
15 rights of Respondent under Sections 10186.2 (b) and 10177(d) (Willful Disregard of Real Estate
16 Laws) of the Code.

17 COST RECOVERY

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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
21 the Administrative Law Judge to direct a licensee found to have committed a violation of this
22 part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the
23 case.

24 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
25 of this Accusation and that upon proof thereof, a decision be rendered revoking all licenses and
26 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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5 STEPHANIE YEE
6 Supervising Special Investigator

7 Dated at Oakland, California, on
8 this 3rd day of August, 2022.

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10 DISCOVERY DEMAND

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