

FILED

FEB 21 2023

DEPARTMENT OF REAL ESTATE

By *By dew*

1 MEGAN LEE OLSEN, Counsel (SBN 272554)
2 Department of Real Estate
3 P. O. Box 137007
4 Sacramento, CA 95813-7007
5 Telephone: (916) 576-8700
6 (916) 263-3767 (Fax)
7 (916) 576-7846 (Direct)

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)	No. H-12599 SF
12 JAMES RONALD MORRIS,)	
13 Respondent.)	<u>FIRST AMENDED ACCUSATION</u>

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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 JAMES RONALD MORRIS (Respondent), is informed and alleges as follows:

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19 At all times herein mentioned, Respondent was and is presently licensed and/or
20 has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and
21 Professions Code (the Code) by the Department of Real Estate (the Department) as a real estate
22 broker.

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24 On or about November 9, 2020, in the Superior Court of California, County of
25 Santa Cruz, Case No. 19CR07635, Respondent was convicted of violating Sections 243 (e)(1)
26 (Battery) and 166 (c)(1) (Contempt – Protective Order) of the California Penal Code, both
27 misdemeanors and crimes which bear a substantial relationship under Section 2910, Title 10,

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 broker license No. 01925322. As a result of said search, no written
6 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

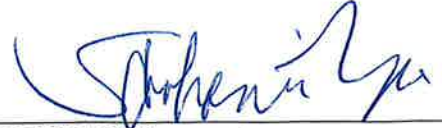
18 6

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
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 15th day of February, 2023.

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11 DISCOVERY DEMAND

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

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