

1 KYLE T. JONES, Counsel (SBN 300751)
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) 576-7840 (Direct)

FILED
OCT 27 2022
DEPARTMENT OF REAL ESTATE
By J. Taggart

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)
12) No. H-12635 SF
13 ALEX JAVIER ABADIA-CHAVEZ,)
14) ACCUSATION
Respondent.)
)

15 The Complainant, STEPHANIE YEE, acting in her official capacity as a
16 Supervising Special Investigator of the State of California, for this Accusation against ALEX
17 JAVIER ABADIA-CHAVEZ (“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 salesperson.

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23 On or about March 8, 2021, Respondent submitted a salesperson renewal
24 application to the Department of Real Estate (“Department”).

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26 In response to Question 13 of said salesperson renewal application to wit:
27 “WITHIN THE SIX-YEAR PERIOD PRIOR TO FILING THIS APPLICATION, HAVE YOU

1 crime) of the Code for the suspension or revocation of all licenses and license rights of
2 Respondent under the Real Estate Law.

3 8

4 Respondent's failure to report the conviction to the Department, as described in
5 Paragraph 5, above, violates Section 10186.2 (a) (conviction reporting requirements) of the
6 Code, and constitutes cause under Section 10177(d) (willful disregard or violation of Real Estate
7 Law) of the Code for the suspension or revocation of all licenses and license rights of
8 Respondent under the Real Estate Law.

9 COST RECOVERY

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11 The Department will seek to recover the costs of the investigation and prosecution
12 of this case pursuant to Section 10106 of the Code which provides, in pertinent part, that in any
13 order issued in resolution of a disciplinary proceeding before the Department, the Commissioner
14 may request the administrative law judge to direct a licensee found to have committed a violation
15 of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement
16 of the case.

17 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
18 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary
19 action against all licenses and license rights of Respondent under the Real Estate Law, for the
20 cost of investigation and enforcement as permitted by law, and for such other and further relief as
21 may be proper under other provisions of law.

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23 STEPHANIE YEE

24 Supervising Special Investigator

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26 Dated at Oakland, California,
27 this 26th day of October, 2022.

DISCOVERY DEMAND

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Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the Department hereby makes demand for discovery pursuant to the guidelines set forth in the *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 Administrative Hearings deems appropriate.