2	FILED
1	KYLE T. JONES, Counsel (SBN 300751) JAN 3 0 2023 Department of Real Estate DEPARTMENT OF REAL ESTATE
2	Department of Real Estate P.O. BOX 137007
3	Sacramento, CA 95813-7007
4	Telephone: (916) 576-8700
5	(916) 263-3767 (Fax) (916) 576-7840 (Direct)
6	
7	
8	BEFORE THE DEPARTMENT OF REAL ESTATE
9	STATE OF CALIFORNIA
10	* * *
11	In the Matter of the Accusation of)) No. H-12653 SF
12	ERIC GREGORY DONELSON,
13 14	Respondent.) <u>ACCUSATION</u>
14	
16	The Complainant, STEPHANIE YEE, acting in her official capacity as a Supervising Special Investigator of the State of California, for this Accusation against ERIC
17	GREGORY DONELSON ("Respondent"), is informed and alleges as follows:
18	1
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.
22	2
23	On or about March 6, 2020, in the Superior Court of the State of California,
24	County of Los Angeles, Case No. 9VW06568, Respondent was convicted of violating Section
25	10851(a) (take vehicle without consent) of the California Vehicle Code, a misdemeanor and a
26	crime that bears a substantial relationship to the qualifications, functions or duties of a real estate
27	licensee pursuant to Section 2910, Title 10, of the California Code of Regulations.
	1

ll

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), 10177(b) (conviction of substantially related crime),	
5	and 10177(j) (fraud or dishonest dealing) of the Code for the suspension or revocation of all	
6	licenses and license rights of Respondent under the Real Estate Law.	
7	<u>COST RECOVERY</u>	
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	the 'A	
21	Super the	
22	STEPHANIE YEE	
23	Supervising Special Investigator	
24		
25	Dated at Oakland, California,	
26	this 25th day of Junuary, 2023.	
27		

2

,

1	DISCOVERY DEMAND	
2	Pursuant to Sections 11507.6, et seq. of the Administrative Procedure Act, the	
3	Department hereby makes demand for discovery pursuant to the guidelines set forth in the	
4	Administrative Procedure Act. Failure to provide Discovery to the Department may result in the	
5	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	- B	
14		
15		
16		
17		
18		
19		
20		
21		
22		
23	e	
24		
25		
26	8	
27		
	3	
I		4

. .