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FEB 28 2025

DEPT. OF REAL ESTATE

By [REDACTED]

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8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of) No. H-12757 SF
12)
13 ADRIAN ANTHONY VELIZ CUEVAS,) ACCUSATION
14)
15 Respondent.)
16)

17 The Complainant, Stephanie Yee, a Supervising Special Investigator of the State
18 of California, for cause of Accusation of ADRIAN ANTHONY VELIZ CUEVAS, a.k.a.
19 "Adrian Veliz" ("Respondent"), alleges as follows:

20 1.

21 The Complainant, Stephanie Yee, a Supervising Special Investigator of the State
22 of California, makes this Accusation in her official capacity.

23 LICENSE HISTORY

24 2.

25 Respondent is presently licensed and/or has license rights under the Real Estate
26 Law, Part 1 of Division 4 of the California Business and Professions Code ("Code"), as a real
27 estate salesperson with Department of Real Estate ("Department" or "DRE") License ID
02120386. On or about February 12, 2029, Respondent's real estate salesperson license is set

1 to expire, unless renewed.

2 CRIMINAL CONVICTION

3 3.

4 a. On or about October 26, 2022, in the Superior Court of California, County of
5 Mateo, Case No. 22-SF-0131314-A, a felony complaint was filed against Respondent for the
6 following three (3) charges: two counts of violation of Penal Code section 550(a)(1) (insurance
7 fraud), both felonies, and one count of violation of Penal Code section 148.5(a) (false report of
8 a criminal offense), a misdemeanor.

9 b. On or about March 16, 2023, in the Superior Court of California, County of
10 Mateo, Case No. 22-SF-013131-A, Respondent was convicted, upon a no contest plea, for
11 violating Penal Code section 550(b)(1) (insurance fraud), a misdemeanor. The court sentenced
12 Respondent to a supervised probation for a period of one (1) year and six (6) days in county
13 jail.

14 4.

15 The conviction, as described in Paragraph 3 above, bears a substantial
16 relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations
17 ("Regulations") to the qualifications, functions or duties of a real estate licensee.

18 5.

19 The crime for which Respondent was convicted, as described in Paragraph 3
20 above, constitutes cause under Code sections 490 and 10177(b) for the suspension or
21 revocation of the license and license rights of Respondent under the Real Estate Law.

22 FAILURE TO REPORT CONVICTION

23 6.

24 Code Section 10186.2 states: *"(a)(1) A licensee shall report any of the*
25 *following to the department:*

26 *(A) The bringing of a criminal complaint, information, or indictment charging a*
27 *felony against the licensee.*

ACCUSATION

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1 *(B) The conviction of the licensee, including any verdict of guilty, or plea of*
2 *guilty or no contest, of any felony or misdemeanor.*
3 *(C) Any disciplinary action taken by another licensing entity or authority of this*
4 *state or of another state or an agency of the federal government.*
5 *(2) The report required by this subdivision shall be made in writing within 30*
6 *days of the date of the bringing of the indictment or the charging of a felony, the conviction, or*
7 *the disciplinary action."*

8 7.

9 a. Respondent failed to report in writing to the Department the criminal
10 complaint charging felonies described in Paragraph 3a above, within thirty (30) days of the
11 charging of the felonies.

12 b. Respondent failed to report in writing to the Department the criminal
13 conviction described in Paragraph 3b above, within thirty (30) days of the conviction.

14 8.

15 a. Respondent's failure to timely report the bringing of the felony charges
16 described in Paragraph 3a above constitutes cause under Sections 10177(d) (willful disregard or
17 violation of real estate law) and 10186.2(a)(1)(A) of the Code for the suspension or revocation
18 of the license and license rights of Respondent under the Real Estate Law.

19 b. Respondent's failure to timely report the conviction described in Paragraph 3
20 above constitutes cause under Sections 10177(d) (willful disregard or violation of real estate
21 law) and 10186.2(a)(1)(B) (reporting requirements) of the Code for the suspension or
22 revocation of the license and license rights of Respondent under the Real Estate Law.

23 **COSTS OF INVESTIGATION AND ENFORCEMENT**

24 9.

25 Section 10106 of the Code, provides, in pertinent part, that in any order issued in
26 resolution of a disciplinary proceeding before the Department of Real Estate, the Commissioner
27 may request the administrative law judge to direct a licensee found to have committed a

1 violation of this part to pay a sum not to exceed the reasonable costs of the investigation and
2 enforcement of the case.

3 9.

4 These proceedings are brought under the provisions of Section 10100, Division
5 4 of the Business and Professions Code of the State of California and Sections 11500 through
6 11528 of the California Government Code.

7 WHEREFORE, Complainant prays that a hearing be conducted on the
8 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
9 disciplinary action against all the licenses and license rights of ADRIAN ANTHONY VELIZ
10 CUEVAS under the Real Estate Law, for the costs of investigation and enforcement as
11 permitted by law, and for such other and further relief as may be proper under other applicable
12 provisions of law.

13
14 Dated at Oakland, California, on February 24, 2025.

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17
18 Stephanie Yee
19 Supervising Special Investigator
20

21
22 cc: ADRIAN ANTHONY VELIZ CUEVAS
23 Side, Inc.
24 Stephanie Yee
25 Sacto.
26
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