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FILED
APR 03 2025
DEPARTMENT OF REAL ESTATE
By J. Taggart

7
8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

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11 In the Matter of the Application of)
12 DONALD CHARLES BACHMANN,) No. H-12760-SF
13 Respondent.) STATEMENT OF ISSUES

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15 The Complainant, STEPHANIE YEE, a Supervising Special Investigator of the
16 State of California, for Statement of Issues against DONALD CHARLES BACHMANN
17 ("Respondent"), alleges as follows:

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19 Complainant makes this Statement of Issues in her official capacity.

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21 On or about May 29, 2023, Respondent made application to the Department of
22 Real Estate of the State of California (the "Department") for a real estate license.

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24 On or about May 22, 2018, in the Superior Court of the State of California,
25 County of Santa Clara, Case No. C-1780221, Respondent was convicted of violating Sections
26 23152(b) (driving under the influence of alcohol above .08% with prior) and 20002(a) (hit and
27 run with property damage) of the California Vehicle Code, both misdemeanors and crimes that

1 bear a substantial relationship to the qualifications, functions, or duties of a real estate licensee
2 under Section 2910, Title 10, Chapter 6, of the California Code of Regulations.

3 4

4 Respondent's criminal convictions, as set out in Paragraph 3 above, constitute
5 cause for denial of Respondent's application for a real estate license pursuant to the provisions of
6 Sections 480(a) (conviction of crime) and 10177(b) (conviction of crime) of the Business and
7 Professions Code.

8 MATTERS IN AGGRAVATION

9 5

10 On or about January 13, 2000, in the Superior Court of the State of California,
11 County of Santa Clara, Case No. C9946061, Respondent was convicted of violating Section
12 484/488 (theft) of the California Penal Code, a misdemeanor.

13 6

14 On or about June 21, 2000, in the Superior Court of the State of California,
15 County of Santa Clara, Case No. CC075220, Respondent was convicted of violating Section
16 148(a)(1) (resisting/obstructing a public officer) of the California Penal Code, and Sections
17 11364 (possession of controlled substance paraphernalia) and 11377(a) (possession of a
18 controlled substance) of the California Health and Safety Code, all misdemeanors.

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20 On or about January 24, 2006, in the Superior Court of the State of California,
21 County of Santa Clara, Case No. CC502726, Respondent was convicted of violating Section
22 12500(a) (driving without a license) of the California Vehicle Code, a misdemeanor.

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24 On or about April 6, 2007, in the Superior Court of the State of California, County
25 of Santa Clara, Case No. CC754728, Respondent was convicted of violating Section 11550(a)
26 (under the influence of a controlled substance) of the California Health and Safety Code, a
27 misdemeanor.

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On or about June 12, 2007, in the Superior Court of the State of California,
County of Santa Clara, Case No. CC642694, Respondent was convicted of violating Section
11550(a) of the California Health and Safety Code, a misdemeanor.

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On or about December 1, 2008, in the Superior Court of the State of California,
County of Santa Clara, Case No. CC780735, Respondent was convicted of two counts of
violating Section 10851(a) (driving or taking vehicle without consent) and one count of violating
Section 20001(a) (felony hit and run with injury) of the California Vehicle Code, all felonies.

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On or about January 24, 2012, in the Superior Court of the State of California,
County of Santa Clara, Case No. CC1121262, Respondent was convicted of violating Sections
2800.2(a) (reckless evading) and 23152(a) (driving under the influence of alcohol) of the
California Vehicle Code, a felony and misdemeanor, respectively, and Section 11550(a) of the
California Health and Safety Code, a misdemeanor.

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On or about February 27, 2015, in the Superior Court of the State of California,
County of Santa Clara, Case No. CC1484690, Respondent was convicted of violating Sections
2800.2(a) and 23152(a) of the California Vehicle Code, a felony and a misdemeanor,
respectively, and Section 242/243(c)(2) (battery/battery on a peace officer) of the California
Penal Code, a misdemeanor.

WHEREFORE, Complainant prays that the above-entitled matter be set for
hearing and, upon proof of the charges contained herein, that the Commissioner refuse to

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1 authorize the issuance of and deny the issuance of a real estate license to Respondent, and for
2 such other and further relief as may be proper under other law.

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6 STEPHANIE YEE
Supervising Special Investigator

7 Dated at Oakland, California,
8 this 28th day of March, 2025.

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10 DISCOVERY DEMAND

11 The Department of Real Estate hereby requests discovery pursuant to Section
12 11507.6 of the California Government Code. Failure to provide discovery to the Department may
13 result in the exclusion of witnesses and/or documents at the hearing, and other sanctions as the
14 Administrative Law Judge deems appropriate.