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FILED

AUG 20 2025

DEPARTMENT OF REAL ESTATE
By B. Nichols

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of)

ALAN JOHN RALPH,)

Respondent.)

No. H-12774 SF

ACCUSATION

Complainant, STEPHANIE YEE, acting in her official capacity as a Supervising
Special Investigator of the State of California, for cause of Accusation against ALAN JOHN
RALPH ("Respondent"), is informed and alleges as follows:

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

CRIMINAL CONVICTION

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On or about June 18, 2024, in the Superior Court of the State of California,
County of San Joaquin, Case No. MAN-CR-2023-12563, Respondent was convicted of violating
Section 23153(a) (driving under the influence: causing bodily injury) of the California Vehicle
Code, with enhancement/aggravating factors pursuant to Penal Code Section 12022.7(a) (great
bodily injury) and Vehicle Code Section 23540 (one prior within 10 years), a felony and crime

1 that bears a substantial relationship to the qualifications, functions, or duties of a real estate
2 licensee pursuant to Section 2910, Title 10, of the California Code of Regulations
3 (“Regulations”).

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5 The facts alleged in Paragraph 2 above, constitute cause under Sections 490
6 (conviction of substantially related crime) and 10177(b) (conviction of substantially related
7 crime) of the Code for suspension or revocation of Respondent’s license and license rights under
8 the Real Estate Law.

9 FACTOR IN AGGRAVATION

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11 On or about January 27, 2023, in the Scottsdale City Court, Maricopa
12 County, State of Arizona, Case No. SC-2022015831, Respondent was convicted of violating
13 SRC Section 19-19A (M1) (urinating in public), a misdemeanor.

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15 On or about July 20, 2018, in the Superior Court of the State of California,
16 County of Alameda, Case No.18-CR-002114, Respondent was convicted of violating Vehicle
17 Code section 23152(b) (driving with blood alcohol 0.08% causing bodily injury), a
18 misdemeanor.

19 FAILURE TO NOTIFY THE DEPARTMENT

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21 Section 10186.2 of the Code states:

22 “(a)(1) A licensee shall report any of the following to the department:

23 (A) The bringing of a criminal complaint, information, or indictment charging a
24 felony against the licensee.

25 (B) The conviction of the licensee, including any verdict of guilty, or plea of
26 guilty or no contest, of any felony or misdemeanor.

27 (C) Any disciplinary action taken by another licensing entity or authority of this
state or of another state or an agency of the federal government.

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1 (2) The report required by this subdivision shall be made in writing within 30
2 days of the date of the bringing of the indictment or the charging of a felony, the
conviction, or the disciplinary action.”

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4 Respondent failed to report in writing to the Department the criminal complaint
5 charging the felony described in Paragraph 2 above, within thirty (30) days of the charging of the
6 felony.

7 Respondent failed to report in writing to the Department the criminal conviction
8 described in Paragraph 2 above, within thirty (30) days of the conviction.

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10 Respondent’s failure to timely report the bringing of the felony charges described
11 in Paragraph 2 above constitutes cause under Sections 10177(d) (willful disregard or violation of
12 real estate law) and 10186.2(a)(1)(A) (reporting requirements) of the Code for the suspension or
13 revocation of the license and license rights of Respondent under the Real Estate Law.

14 Respondent’s failure to timely report the conviction described in Paragraph 2
15 above constitutes cause under Sections 10177(d) (willful disregard or violation of real estate law)
16 and 10186.2(a)(1)(B) (reporting requirements) of the Code for the suspension or revocation of
17 the license and license rights of Respondent under the Real Estate Law.

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19 The facts alleged in Paragraphs 7 and 8 above constitute cause under Sections
20 10177(d) (willful disregard or violation of real estate law) and 10186.2 (reporting requirements)
21 of the Code for suspension or revocation of all licenses and license rights of Respondent under
22 Division 4 Part 1 of the Code.

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COST RECOVERY

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Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, the Commissioner may request the Administrative Law Judge to direct a licensee found to have committed a violation of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all licenses and license rights of Respondent under the Code, for the reasonable costs of investigation and enforcement as permitted by law, including agency attorney's fees, and for such other and further relief as may be proper under provisions of law.



STEPHANIE YEE
Supervising Special Investigator

Dated at Oakland, California

this 18th day of August 2025.

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