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MAR 24 2026

DEPARTMENT OF REAL ESTATE

By       B. den      

1 JESSICA CHEONG, Counsel (281499)  
2 Department of Real Estate  
3 651 Bannon Street, Suite 507  
4 Sacramento, CA 95811

5 Telephone: (916) 737-4539  
6 Email: Jessica.Cheong@dre.ca.gov

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8 BEFORE THE DEPARTMENT OF REAL ESTATE  
9 STATE OF CALIFORNIA

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11 In the Matter of the Accusation of 12 SUZANNE MARIE FERRARI 13 Respondent.	) ) ) ) )	No. H-12816 SF  <u>ACCUSATION</u>
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14 Complainant, STEPHANIE YEE, acting in her official capacity as a Supervising  
15 Special Investigator of the State of California, for cause of Accusation against SUZANNE  
16 MARIE FERRARI, also known as SUZANNE MARIE BOYAJIAN (“Respondent”), is  
17 informed and alleges as follows:

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

22 CRIMINAL CONVICTIONS

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24 On or about February 13, 2025, in the Superior Court of California, County of  
25 Marin, Case No. CR0002114, Respondent was convicted of violating Sections 243.3 (battery  
26 with injury on transportation personnel/passenger) and 148(a)(1) (obstruct/resist/delay  
27 public/peace officer/emergency technician) of the California Penal Code, misdemeanors and

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

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

8 FAILURE TO NOTIFY THE DEPARTMENT

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10 Section 10186.2 of the Code states:

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

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

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

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

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

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

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

COST RECOVERY

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 19th day of March 2026.

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.

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