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FILED
MAY 19 2026
DEPARTMENT OF REAL ESTATE
By J. Taggart

7 BEFORE THE DEPARTMENT OF REAL ESTATE
8 STATE OF CALIFORNIA

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10 In the Matter of the Accusation of)

11 RUSSELL MAYNARD,)

12 Respondent.)
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No. H-12819 SF

ACCUSATION

14 The Complainant, STEPHANIE YEE, a Supervising Special Investigator of the
15 State of California, for cause of Accusation against RUSSELL MAYNARD ("Respondent"), is
16 informed and alleges as follows:

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18 Complainant makes this Accusation against Respondent in her official capacity.

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20 Respondent is presently licensed and/or has license rights under the Real Estate
21 Law, Part 1 of Division 4 of the California Business and Professions Code ("Code") by the
22 Department of Real Estate ("Department") as a real estate salesperson.

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24 On or about June 18, 2024, in the Superior Court of the State of California,
25 County of Santa Clara, Case No. C2404043, Respondent was convicted of violating Section
26 23153(b) (driving with blood alcohol of .08% or more causing bodily injury) of the California
27 Vehicle Code, a misdemeanor crime which bears a substantial relationship under Section 2910,

1 Title 10, California Code of Regulations, to the qualifications, functions, or duties of a real estate
2 licensee.

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4 At no time did Respondent provide written notice to the Department within 30
5 days of suffering a criminal conviction as set forth in paragraph 3, above, as required by Section
6 10186.2(a)(1)(B) and (a)(2) of the Code.

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8 The facts alleged in Paragraphs 3 and 4 above constitute cause under Sections
9 490 and 10177(b) (conviction of substantially related crime), 10177(d) (willful disregard of real
10 estate laws) and 10186.2 (failure to notify) of the Code for suspension or revocation of all
11 licenses and license rights of Respondent under Part 1 of Division 4 of the Code.

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13 Section 10106 of the Code provides, in pertinent part, that in any order issued
14 in resolution of a disciplinary proceeding before the Department, the commissioner may request
15 the administrative law judge to direct a licensee found to have committed a violation of this part
16 to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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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 prosecution of this case, including agency attorney's fees and for such other and further relief as may be proper under provisions of law.

Arhamin Yeo

STEPHANIE YEE

Supervising Special Investigator

Dated at Sacramento, California

this 11th day of May 2026.

DISCOVERY DEMAND

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