

7-10-15
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FILED

OCT 01 2015

BUREAU OF REAL ESTATE

By *[Signature]*

BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

* * *

11 In the Matter of the Accusation of) No. H-39975 LA
12)
13 UGUR KEREM ORAL,) FIRST AMENDED
14) ACCUSATION
15 Respondent.)
16)

17 This First Amended Accusation amends the Accusation filed on September 23,
18 2015. The Complainant, Maria Suarez, a Supervising Special Investigator of the State of
19 California for cause of Accusation against UGUR KEREM ORAL ("Respondent") alleges as
20 follows:

1.

21 The Complainant, Maria Suarez, a Deputy Real Estate Commissioner of the
22 State of California, makes this Accusation in her official capacity.

2.

23 Respondent is presently licensed and/or has license rights under the Real Estate
24 Law, Part 1 of Division 4 of the California Business and Professions Code as a real estate
25 salesperson (license no. 01511362).

26 ///

(CEASE AND DESIST ORDER)

3.

On or about February 12, 2014, in case no. CR-57463, the California Department of Consumer Affairs–Bureau of Electronic and Appliance Repair, Home Furnishings, and Thermal Insulator (“BEAR”) issued and served an Order of Abatement on Respondent for his violation of California Business and Professions Code section 9840 (acting as a service dealer without proper registration). This Order of Abatement ordered Respondent to cease and desist from operating as a service dealer. Specifically, Respondent offered and provided cell phone repair services, and operated a cell phone repair store, DNZ Wireless, which is located at 2033 South Hacienda Blvd., Hacienda Heights, CA 91745. Respondent was given the opportunity to request a hearing, but did not do so. To date, Respondent continues act as a service dealer without proper registration.

4.

The allegations in Paragraph 3, above, constitute cause for suspension or revocation of Respondent’s real estate license under California Business and Professions Code sections 10177(f) and 10177(j).

(FAILURE TO REVEAL CEASE AND DESIST ORDER)

5.

On or about September 1, 2015, Respondent filed a Salesperson Renewal Application. In response to Question 18 of his Salesperson Renewal Application, to wit: “WITHIN THE SIX-YEAR PERIOD PRIOR TO FILING THIS APPLICATION, HAVE YOU EVER BEEN ORDERED TO CEASE, DESIST[,] AND/OR REFRAIN FROM DOING AN ACT(S), OR FROM VIOLATING A LAW, RULE[,] OR REGULATION BY, OR CITED FOR A BREACH OF ETHICS OR UNPROFESSIONAL CONDUCT, BY AN ADMINISTRATIVE AGENCY OR PROFESSIONAL ASSOCIATION IN CALIFORNIA OR

1 ANY OTHER STATE?" Respondent answered, "No," and failed to reveal the Order of
2 Abatement described in Paragraph 3, above.

3 6.

4 Respondent's failure to reveal the Order of Abatement in his Salesperson
5 Renewal Applications constitutes knowingly making a false statement of material fact required
6 to be revealed in said application, which is grounds for revoking a license under California
7 Business and Professions Code sections 475(a)(1), 480(d), and 10177(a).

8 7.

9 California Business and Professions Code section 10106 provides, in pertinent
10 part, that in any order issued in resolution of a disciplinary proceeding before the bureau, the
11 Commissioner may request the administrative law judge to direct a licensee found to have
12 committed a violation of this part to pay a sum not to exceed the reasonable costs of
13 investigation and enforcement of the case.

14 WHEREFORE, Complainant prays that a hearing be conducted on the
15 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
16 disciplinary action against all licenses and/or license rights under the Real Estate Law (Part 1 of
17 Division 4 of the California Business and Professions Code) of Respondent UGUR KEREM
18 ORAL for the cost of investigation and enforcement as permitted by law, and for such other and
19 further relief as may be proper under applicable provisions of law.

20 Dated at Los Angeles, California: September 28, 2015.

21
22 
23 Maria Suarez
24 Supervising Special Investigator

25 cc: UGUR KEREM ORAL
26 Coldwell Banker Residential Brokerage Company
27 Maria Suarez
Sacto.