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FILED

JUN 16 2016

BUREAU OF REAL ESTATE

By 

BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

13 In the Matter of the Accusation of)

No. H-40287 LA

14 RAY DOMINGUEZ,)

A C C U S A T I O N

15 Respondent.)
16)

17
18 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
19 of California, for cause of Accusation against RAY DOMINGUEZ ("Respondent") alleges as
20 follows:

21 1.

22 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
23 of California, makes this Accusation in her official capacity.

24 2.

25 Respondent is presently licensed and/or has license rights under the Real Estate
26 Law, Part 1 of Division 4 of the California Business and Professions Code ("Code") as a real
27 estate broker. Respondent's license expires on October 9, 2017, unless renewed.

1 CRIMINAL CONVICTION

2 3.

3 On or about December 14, 2015, in the Superior Court for the State of
4 California, County of Los Angeles, in Case No. LA081772, Respondent was convicted of
5 violating Penal Code Section 422(a) [Threaten crime with intent to terrorize], reduced to a
6 misdemeanor. The underlying facts of this crime bear a substantial relationship under Section
7 2910, Title 10, Chapter 6, California Code of Regulations ("Regulations") to the qualifications,
8 functions or duties of a real estate licensee.

9 4.

10 The crime of which Respondent was convicted, as described in Paragraph 3,
11 above, constitutes cause under Sections 490 and 10177(b) of the Code for the suspension or
12 revocation of the license and license rights of Respondent under the Real Estate Law.

13 FAILURE TO REPORT FILING OF FELONY COMPLAINT

14 5.

15 Code Section 10186.2, subdivision (a)(1)(A), requires real estate licensees to
16 report to the Bureau any bringing of a complaint charging a felony against the licensee. Said
17 report must be made in writing within 30 days from the charging of the felony under Code
18 Section 10186.2(a)(2).

19 6.

20 On September 16, 2015, Respondent was charged with a felony in the California
21 Superior Court, Los Angeles County, in Case No. LA081772. The felony complaint charges
22 Respondent with violating Penal Code Section 422(a) [Threaten crime with intent to terrorize],
23 a felony.

24 7.

25 Respondent's failure to report the filing of the felony complaint alleged in
26 Paragraph 6. above, to the Bureau in writing within 30 days of the filing of the felony complaint
27 as required by the provisions of Code Section 10186.2(a)(1)(A) and 10186.2(a)(2) constitutes

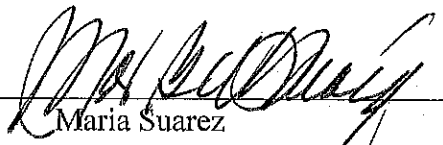
1 grounds under Code Section 10186.2(b) to suspend or revoke Respondent's license and license
2 rights pursuant to Code Sections 10177(d) and/or 10177(g).

3 Code Section 10106 provides in pertinent part that in any order issued in
4 resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the
5 administrative law judge to direct a licensee found to have committed a violation of this part to
6 pay a sum not to exceed the reasonable costs of investigation and enforcement of the case.

7 WHEREFORE, Complainant prays that a hearing be conducted on the
8 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
9 disciplinary action against all the licenses and license rights of Respondent RAY
10 DOMINGUEZ under the Real Estate Law (Part 1 of Division 4 of the Business and Professions
11 Code), for the cost of investigation and enforcement as permitted by Code Section 10106, and
12 for such other and further relief as may be proper under other applicable provisions of law.

13 Dated at Los Angeles, California

14 this 13th day of June, 2016.

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17 
18 Maria Suarez
19 Supervising Special Investigator
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24 cc: RAY DOMINGUEZ
25 Maria Suarez
26 Sacto.
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