

FILED

OCT - 8 2019

DEPT. OF REAL ESTATE
By *Adel Solano*

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9 **BEFORE THE DEPARTMENT OF REAL ESTATE**
10 **STATE OF CALIFORNIA**

11 * * *

12 In the Matter of the Accusation of) No. H-41513 LA.
13 JULIAN MORE OJEDA,) ACCUSATION
14 Respondent.)
15 _____)

16 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
17 of California, for cause of Accusation against JULIAN MORE OJEDA ("Respondent"), also
18 known as Julian Ojeda, alleges as follows:

19 1.

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

22 2.

23 Respondent presently has license rights under the Real Estate Law, Part 1 of
24 Division 4 of the California Business and Professions Code ("Code"), as a real estate
25 salesperson (License ID 01916699). Respondent's license is scheduled to expire on May 1,
26 2021.

27 ///

ACCUSATION

1 FIRST CAUSE OF ACCUSATION

2 (CRIMINAL CONVICTIONS)

3 3.

4 On or about March 6, 2018, in the Superior Court of California, County of San
5 Bernardino, Case No. FVI18000230, Respondent was convicted on a plea of no contest for
6 violation of Penal Code section 550(b)(1) (insurance fraud), a felony, and for violation of
7 Vehicle Code section 10501 (false report of vehicle theft with intent to deceive), a
8 misdemeanor. Respondent was placed on formal probation for 36 months, on certain terms and
9 conditions, including, in part, serving 60 days in county jail, not working for the Bureau of
10 Auto Repairs while on probation, making restitution to Geico Insurance Company in the
11 amount of \$549.33, and payment of a fine.

12 4.

13 The convictions, as described in Paragraph 3 above, bear a substantial
14 relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the
15 qualifications, functions or duties of a real estate licensee.

16 5.

17 The crimes of which Respondent was convicted, as described in Paragraph 3
18 above, constitute cause under Sections 490 and 10177(b) of the Code for the suspension or
19 revocation of the license and license rights of Respondent under the Real Estate Law.

20 SECOND CAUSE OF ACCUSATION

21 (FAILURE TO REPORT CONVICTIONS)

22 6.

23 Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, "the
24 conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any
25 felony or misdemeanor" to the Department of Real Estate ("Department") within thirty (30)
26 days of the conviction. Respondent failed to report in writing to the Department the convictions
27 described in Paragraph 3 above, within thirty (30) days of the conviction date.

ACCUSATION

7.

Respondent's failure to timely report the convictions constitute cause under Section 10186.2 of the Code for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

(COSTS OF INVESTIGATION AND ENFORCEMENT)

8.

California Business and Professions Code section 10106, provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Bureau of Real Estate, 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 the licenses and license rights of Respondent JULIAN MORE OJEDA under the Real Estate Law, for the costs of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California this 3rd day of October, 2019.


Maria Suarez
Supervising Special Investigator

cc: JULIAN MORE OJEDA
Mulhearn Realtors Inc
Maria Suarez
Sacto.