| 1 | KATHY YI, Counsel (SBN 236736) Department of Real Estate |
|----|---|
| 2 | 320 West 4th Street, Suite 350 |
| 3 | Los Angeles, California 90013-1105 Telephone: (213) 576-6982 JUL 0 2 2020 |
| 4 | Direct: (213) 576-6940 DEPT. OF REAL ESTATE |
| 5 | Fax: (213) 576-6917 Attorney for Complainant |
| | |
| 6 | |
| 7 | |
| 8 | DEFECTOR WAY BY A TO THE STATE OF THE STATE |
| 9 | BEFORE THE DEPARTMENT OF REAL ESTATE |
| 10 | STATE OF CALIFORNIA |
| 11 | *** |
| 12 | In the Matter of the Accusation of) No. H-41708 LA |
| 13 | CHRISTOPHER EDWARD PEREA,) <u>ACCUSATION</u> |
| 14 | Respondent. |
| 15 | |
| 16 | The Complainant, Maria Suarez, a Supervising Special Investigator of the State |
| 17 | of California, for cause of Accusation against CHRISTOPHER EDWARD PEREA, a.k.a. |
| 18 | "Christopher E. Perea," "Christophe Edward Perea," and "Christophe E. Perea," |
| 19 | ("Respondent") alleges as follows: |
| 20 | 1. |
| 21 | The Complainant, Maria Suarez, a Supervising Special Investigator of the State |
| 22 | of California, makes this Accusation in her official capacity. |
| 23 | 2. |
| 24 | Respondent presently has license rights under the Real Estate Law, Part 1 of |
| 25 | Division 4 of the California Business and Professions Code ("Code"), as a real estate |
| 26 | salesperson (License ID 01459130). Respondent's license is set to expire on May 1, 2023, |
| 27 | unless renewed. |

(CRIMINAL CONVICTIONS)

3.

On or about December 20, 2017, in the Superior Court of California, County of San Bernardino, Case No. MWV17016589, Respondent was convicted on a plea of no contest for violation of Vehicle Code section 23103(a) (wet reckless driving), a misdemeanor. The court suspended the imposition of sentence and placed Respondent on summary probation for thirty-six (36) months under certain terms and conditions, including in part, completion of a 26-week parenting class, 30 days in county jail via a rehabilitation center, and payment of fines and fees.

4.

On or about September 13, 2019, in the Superior Court of California, County of Orange, Case No. 18CF3198, Respondent was convicted on a plea of guilty for violations of Vehicle Code section 23152(a) (DUI) and section 20002(a) (hit and run with property damage), both misdemeanors. The court suspended the imposition of sentence and placed Respondent on summary probation for three (3) years under certain terms and conditions, including in part, four (4) days in county jail in lieu of a \$390 fine, 20 days of Cal Trans/physical labor, completion of a 3-month level 1 first offender alcohol program, completion of victim impact counseling, completion of thirty (30) self-help meetings, and payment of restitution, fines and fees.

5.

The convictions, as described in Paragraphs 3 and 4 above, bear a substantial relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real estate licensee.

6.

The crimes for which Respondent was convicted, as described in Paragraphs 3 and 4 above, constitute cause under Code sections 490 and 10177(b) for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

ACCUSATION

б

(IN AGGRAVATION)

7.

On or about October 22, 2013, in the Superior Court of California, County of San Bernardino, Case No. TWV1202388, Respondent was convicted on a plea of guilty for violation of Vehicle Code section 23152(b) (DUI with over 0.08%), a misdemeanor. The court sentenced Respondent to 119 days in county jail.

(FAILURE TO REPORT CONVICTIONS)

8.

Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, "the conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any felony or misdemeanor" to the Department of Real Estate ("Department") within thirty (30) days of the conviction. Respondent failed to report in writing to the Department the convictions described in Paragraphs 3 and 4 above, within thirty (30) days of the conviction dates.

9.

Respondent's failure to timely report the convictions described in Paragraphs 3 and 4 above constitutes 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)

10.

California Business and Professions Code section 10106, provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department 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.

[[///

27 1/

1.

ACCUSATION

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 CHRISTOPHER EDWARD PEREA 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 20th day of

Supervising Special Investigator

cc: CHRISTOPHER EDWARD PEREA

Arreba

Maria Suarez

Sacto.