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FILED

DEC 23 2020

DEPT. OF REAL ESTATE

By *[Signature]*

9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-41857 LA
13 CHARLES SANTOS COSTES,) ACCUSATION
14 Respondent.)

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16 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
17 of California, for cause of Accusation against CHARLES SANTOS COSTES (“Respondent”)
18 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 All references to the “Code” are to the California Business and Professions Code
24 and all references to “Regulations” are to Title 10, Chapter 6, California Code of Regulations.

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1 LICENSE HISTORY

2 3.

3 a. Respondent has license rights under the Real Estate Law, Part 1 of Division 4
4 of the California Business and Professions Code, as a real estate salesperson ("RES"),
5 Department of Real Estate¹ ("Department") license ID 02028573.

6 b. The Department originally issued Respondent's RES license on or about April
7 11, 2017.

8 c. Respondent's RES license is scheduled to expire on April 10, 2021, unless
9 renewed.

10 CAUSE FOR DISCIPLINE

11 (CRIMINAL CONVICTION)

12 4.

13 July 23, 2018; Penal Code ("PC") Section 504/487(a) - Felony

14 a. On or about February 20, 2018, in the Superior Court of California, Los
15 Angeles County, in Case No. **BA465615**, The People of the State of California v. Charles
16 Santos Costes, a felony complaint was brought against Respondent for violation of PC Section
17 504/487(a) (grand theft by embezzlement), a felony.

18 b. On or about July 23, 2018, Respondent pled no contest to and was convicted
19 of violation of PC Section 504/487(a) (grand theft by embezzlement), a felony.

20 b. Also on or about July 23, 2018, the Court suspended the imposition of
21 sentence and placed Respondent on formal probation for 3 years under certain terms and
22 conditions, including, in part, pay restitution in the amount of \$400 and payment of fines and
23 fees.

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27 ¹ Between July 1, 2013 and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate under the Department of Consumer Affairs.

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5.

The crime of which Respondent was convicted, as set forth in Paragraph 4 above, by its facts and circumstances, bears substantial relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real estate licensee and 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.

SECOND CAUSE FOR DISCIPLINE

(FAILURE TO REPORT)

6.

Respondent did not report in writing to the Department of a felony complaint being brought against him within thirty (30) days (February 20, 2018).

7.

Respondent did not report in writing to the Department of his conviction within thirty (30) days of the conviction date (July 23, 2018).

8.

Respondent's failure to report his conviction constitutes cause for discipline under **Code Section 10186.2²** of the license and license rights of Respondent under the Real Estate Law.

COSTS

9.

Code Section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, the Commissioner may request

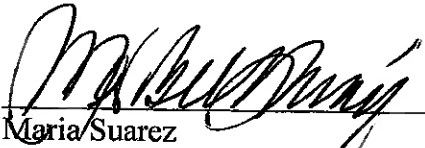
² Pursuant to Business and Professions Code 10186.2: (a)(1) A licensee shall report any of the following to the department: (A) The bringing of an indictment or information charging a felony against the licensee. (B) The conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any felony or misdemeanor. (c) Any disciplinary action taken by another licensing entity or authority of this state or of another state or an agency of the federal government. (2)The report required by this subdivision shall be made in writing within 30 days of the date of the bringing of the indictment or the charging of a felony, the conviction, or the disciplinary action. (b) Failure to make a report required by this section shall constitute a cause for discipline.

1 the administrative law judge to direct a licensee found to have committed a violation of this part
2 to pay a sum not to exceed the reasonable costs of investigation and enforcement of the case.

3 PRAYER

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

10
11 Dated at Los Angeles, California this 15th day of December, 2020.

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13 
14 Maria Suarez
15 Supervising Special Investigator

16 cc: CHARLES SANTOS COSTES
17 Maria Suarez
18 Sacto.

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