

1 KATHY YI, Counsel (SBN 236736)
2 Department of Real Estate
3 320 West 4th Street, Suite 350
4 Los Angeles, California 90013-1105
5 Telephone: (213) 576-6982
6 Direct: (213) 576-6940
7 Fax: (213) 576-6917
8 Attorney for Complainant

FILED

JUN 16 2021

DEPT. OF REAL ESTATE

By John Aguirre

9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-41987 LA
13)
14 ANDREW MICHAEL GIANNOS,) ACCUSATION
15) Respondent.)
16)

17 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
18 of California, for cause of Accusation against ANDREW MICHAEL GIANNOS, a.k.a.
19 "Andrew M. Giannos" and "Andrew Giannos" ("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 02000742). Respondent's license is set to expire on April 20, 2024,
27 unless renewed.

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ACCUSATION

1 (CRIMINAL CONVICTION)

2 3.

3 On or about February 19, 2020, in the Superior Court of California, County of
4 Orange, Case No. 18HF0799, Respondent was convicted, upon guilty pleas, of violations of
5 Penal Code section 245(a)(4) (assault with force likely to produce great bodily injury) and
6 section 243(d) (battery with serious bodily injury), both misdemeanors. The court suspended
7 the imposition of sentence and placed Respondent on formal probation for 3 years, under
8 certain terms and conditions, including in part, 180 days in jail with 90 days stayed on
9 condition of completing 10 weeks of anger management program and payment of fines, fees
10 and restitution.

11 4.

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

15 5.

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

19 (COSTS OF INVESTIGATION AND ENFORCEMENT)

20 6.

21 California Business and Professions Code section 10106, provides, in pertinent
22 part, that in any order issued in resolution of a disciplinary proceeding before the Department
23 of Real Estate, the Commissioner may request the administrative law judge to direct a licensee
24 found to have committed a violation of this part to pay a sum not to exceed the reasonable costs
25 of the investigation and enforcement of the case.

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27 ///

ACCUSATION

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These proceedings are brought under the provisions of Section 10100, Division 4 of the Business and Professions Code of the State of California and Sections 11500 through 11528 of the California Government Code.

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 ANDREW MICHAEL GIANNOS 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 21st day of May, 2021.

Maria Suarez

Maria Suarez
Supervising Special Investigator

cc: ANDREW MICHAEL GIANNOS
Jacqueline Soto
Maria Suarez
Sacto.

ACCUSATION