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FILED

SEP 22 2021

DEPT. OF REAL ESTATE

By *John Aguirre*

10 BEFORE THE DEPARTMENT OF REAL ESTATE

11 STATE OF CALIFORNIA

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13 In the Matter of the Application of) No. H-42100 LA
14 HEDDY SARAGIH,) STATEMENT OF ISSUES
15 Respondent.)
16 _____)

17 The Complainant, Maria Suarez, a Supervising Special Investigator of the State of
18 California, for Statement of Issues against HEDDY SARAGIH ("Respondent"), is informed
19 and alleges in her official capacity as follows:

20 1.

21 On or about November 13, 2020, Respondent made application to the Department of
22 Real Estate ("Department") of the State of California for a real estate salesperson license.

23 (DISCIPLINARY ACTION)

24 2.

25 On or about December 7, 2017, pursuant to the Stipulated Settlement and Disciplinary
26 Order adopted by the Board of Registered Nursing, Department of Consumer Affairs, State of
27 California, in Case No. 2017-45, OAH Case No. 2016100190, the Registered Nurse License

STATEMENT OF ISSUES

1 No. 538080 issued to Respondent was revoked. Said revocation was stayed, and Respondent
2 was placed on probation for three (3) years under certain conditions.

3 Respondent was subject to disciplinary action for violating Business and Professions
4 Code ("Code") section 2761(a)(1) (gross negligence), in that on or about October 9, 2014,
5 Respondent was grossly negligent when he provided a dialysis treatment to the wrong patient,
6 without a physician's order, and then tried to cover up his mistake by writing the order himself.

7 Respondent was subject to disciplinary action for violating Code section 2761(a)
8 (unprofessional conduct), in that on or about October 9, 2014, Respondent committed acts of
9 unprofessional conduct with regard to the care of a patient when he provided a dialysis
10 treatment to the wrong patient, without a physician's order, and then tried to cover up his
11 mistake by writing the order himself.

12 3.

13 The allegations set forth in Paragraph 2 above constitute cause under Code section
14 10177(f) for the denial of license to Respondent.

15 4.

16 These proceedings are brought under the provisions of section 10100, Division 4 of the
17 Business and Professions Code of the State of California and sections 11500 through 11528 of
18 the Government Code.

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1 WHEREFORE, the Complainant prays that the above-entitled matter be set for hearing
2 and, upon proof of the charges contained herein, that the Commissioner refuse to authorize the
3 issuance of, and deny the issuance of, a real estate salesperson license to Respondent HEDDY
4 SARAGIH and for such other and further relief as may be proper under other applicable
5 provisions of law.
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7 Dated at Los Angeles, California

8 this 20th day of September, 2021.
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Maria Suarez

11 Maria Suarez
12 Supervising Special Investigator
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18 cc: HEDDY SARAGIH
19 Maria Suarez
20 Sacto.
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