

FILED

JUN 22 2022

DEPT. OF REAL ESTATE
By 

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8
9 **BEFORE THE DEPARTMENT OF REAL ESTATE**
10 **STATE OF CALIFORNIA**

11 * * *

12 In the Matter of the Accusation of) No. H-42357 LA
13)
14 HEREN MUKESH SAGAR,) ACCUSATION
15)
16 Respondent.)
17 _____)

18 The Complainant, Jason Parson, a Supervising Special Investigator of the State
19 of California, for cause of Accusation against HEREN MUKESH SAGAR, a.k.a. "Heren
20 Sagar" ("Respondent"), alleges as follows:

21 1.

22 The Complainant, Jason Parson, a Supervising Special Investigator of the State
23 of California, makes this Accusation in his official capacity.

24 2.

25 Respondent presently has license rights under the Real Estate Law, Part 1 of
26 Division 4 of the California Business and Professions Code ("Code"), as a real estate
27 salesperson (License ID 01733510). Respondent's license is set to expire on August 27, 2023,
unless renewed.

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ACCUSATION

1 (CRIMINAL CONVICTION)

2 3.

3 On or about July 9, 2021, in the Superior Court of California, County of Los
4 Angeles, Case No. 0GD02403, Respondent was convicted, on a plea of no contest, for violation
5 of Penal Code section 647(a) (disorderly conduct: lewd act), a misdemeanor. The court
6 suspended the imposition of sentence and placed Respondent on summary probation for 12
7 months, under certain terms and conditions, including in part, one (1) day in county jail,
8 completion of a 26-week approved adult sexual offender treatment program, and payment of
9 fines and fees.

10 4.

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

14 5.

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

18 (FAILURE TO REPORT CONVICTION)

19 6.

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

25 7.

26 Respondent's failure to timely report the conviction described in Paragraph 3
27 above constitutes cause under Section 10186.2 of the Code for the suspension or revocation of

ACCUSATION

1 the license and license rights of Respondent under the Real Estate Law.

2 (IN AGGRAVATION)

3 8.

4 On or about August 16, 2013, in the Superior Court of California, County of Los
5 Angeles, Case No. 3GN01330, Respondent was convicted, on a plea of no contest, for violating
6 Vehicle Code section 23152(b) (DUI with BAC of .08% or more), a misdemeanor. The court
7 suspended the imposition of sentence and placed Respondent on summary probation for five
8 (5) years, under certain terms and conditions, including in part, serving 120 days in county jail,
9 15 days of community labor, completion of a 18-month licensed second-offender alcohol and
10 other drug education and counseling program, completion of an SB-38 alcohol program,
11 completion of the Hospital and Morgue (HAM) program and the Victim Impact Panel (VIP) of
12 Mothers Against Drunk Driving (MADD), installation of an ignition interlock device for two
13 (2) years, completion of 52 Alcoholics Anonymous meetings, and payment of fines and fees.
14 The court declared Respondent as a habitual traffic offender and disallowed issuance by DMV
15 of a restricted driver's license.

16 9.

17 On or about July 23, 2012, in the Superior Court of California, County of Los
18 Angeles, Case No. 2GN02199, Respondent was convicted, on a plea of no contest, for violating
19 Vehicle Code section 23103 (reckless driving), a misdemeanor. The court suspended the
20 imposition of sentence and placed Respondent on summary probation for 48 months, under
21 certain terms and conditions, including in part, completion of a 18-month licensed second-
22 offender alcohol and other drug education and counseling program, completion of an SB-38
23 alcohol program, and payment of fines and fees.

24 10.

25 On or about February 9, 2006, in the Superior Court of California, County of
26 Los Angeles, Case No. GA063565, Respondent was convicted, on a plea of guilty, for violating
27 Vehicle Code section 23152(a) (DUI), and convicted, on a plea of no contest, for violating

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1 Penal Code section 69 (resisting peace officer), both misdemeanors. The court suspended the
2 imposition of sentence and placed Respondent on formal probation for 3 years, under certain
3 terms and conditions, including in part, completion of a 52-week anger management counseling
4 program, 30 days of Cal-Trans, and payment of fines and fees.

5 (COSTS OF INVESTIGATION AND ENFORCEMENT)

6 11.

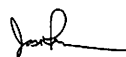
7 California Business and Professions Code section 10106, provides, in pertinent
8 part, that in any order issued in resolution of a disciplinary proceeding before the Department
9 of Real Estate, the Commissioner may request the administrative law judge to direct a licensee
10 found to have committed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

12 12.

13 These proceedings are brought under the provisions of Section 10100, Division
14 4 of the Business and Professions Code of the State of California and Sections 11500 through
15 11528 of the California Government Code.

16 WHEREFORE, Complainant prays that a hearing be conducted on the
17 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
18 disciplinary action against all the licenses and license rights of Respondent HEREN MUKESH
19 SAGAR under the Real Estate Law, for the costs of investigation and enforcement as permitted
20 by law, and for such other and further relief as may be proper under other applicable provisions
21 of law.

22
23 Dated at Los Angeles, California
24 this 22nd day of June, 2022.

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27
Jason Parson
Supervising Special Investigator

ACCUSATION

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cc: HEREN MUKESH SAGAR
eXp Realty of California, Inc.
Jason Parson
Sacto.