

FILED

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DEPT. OF REAL ESTATE

By

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BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of
EULEXUS J THOMAS,
Respondent.

No. H-42511-LA
ACCUSATION

The Complainant, Maria Suarez, a Supervising Special Investigator for the Department of Real Estate ("Department") of the State of California, for cause of Accusation against EULEXUS J THOMAS, also known as Eulexus Janaye Thomas ("Respondent"), is informed and alleges in her official capacity as follows:

1. The Complainant, Maria Suarez, acting in her official capacity as a Supervising Special Investigator, makes this Accusation against Respondent.

2. Respondent presently has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code ("Code"), as a real estate salesperson (License ID 02112714).

FIRST CAUSE OF ACCUSATION

(CRIMINAL CONVICTION)

3. On or about July 2, 2021, in Los Angeles County Superior Court, Case No. PA093237, Respondent was convicted based on her plea of nolo contendere for violation of Penal Code section 452(c) (arson – unlawfully causing a fire of a structure or forest land), a felony. The

ACCUSATION

1 court suspended imposition of sentence and placed Respondent on probation for 36 months,
2 subject to terms and conditions including but not limited to: serving 1 day jail time, with credit for
3 1 day for time served; performing 240 hours of community labor; making restitution to the victim;
4 obeying the protective order; registering as a convicted arson offender pursuant to Penal Code
5 section 457.1; paying restitution to the victim; paying a restitution fine, assessments, probation
6 costs, and fees; completing a 26-week anger management counseling program; and completing
7 one year of psychological counseling. Also on or about July 2, 2021, a Criminal Protective
8 Order—Domestic Violence was issued against Respondent, restraining her from having any
9 contact with, and ordering her to not come within 100 yards of, two protected persons.

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

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

16 SECOND CAUSE OF ACCUSATION

17 (FAILURE TO REPORT CONVICTION)

18 6. On or about July 2, 2021, Respondent was convicted based on her plea of nolo
19 contendere for violation of Penal Code section 452(c) (arson – unlawfully causing a fire of a
20 structure or forest land), a felony.

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

26 8. Respondent’s failure to timely report the conviction constitutes cause under Section
27 10186.2 of the Code for the suspension or revocation of the license and license rights of
28 Respondent under the Real Estate Law.

1 COSTS

2 (COSTS OF INVESTIGATION AND ENFORCEMENT)

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

8 WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this
9 Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action
10 against all the licenses and license rights of Respondent EULEXUS J THOMAS under the Real
11 Estate Law, for the costs of investigation and enforcement as permitted by law, and for such other
12 and further relief as may be proper under other applicable provisions of law.

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14 Dated at Los Angeles, California this 16th day of December, 2022.

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16
17 Maria Suarez
18 Maria Suarez
19 Supervising Special Investigator

20 cc: EULEXUS J THOMAS
21 Maria Suarez
22 Sacto.
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