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(Count 1)), a felony.

ACCUSATION

OCT 1 4 2024

- 4. On or about August 21, 2023, in Los Angeles County Superior Court Case No. BA515167, a misdemeanor complaint was filed against Respondent for violation of Vehicle Code sections 2800.2 (fleeing a peace officer's motor vehicle while driving in willful and wanton disregard for the safety of persons and property (Count 1)), and 23103 (driving a vehicle in willful and wanton disregard for the safety of persons and property (Count 2)), both of which are misdemeanors.
- 5. On or about February 8, 2024, in Los Angeles County Superior Court Case No. BA515167, Respondent was found guilty and convicted based on his plea of nolo contendere for a violation of Vehicle Code section 2800.1(a) (operating a motor vehicle with intent to evade and willfully fleeing pursuing peace officer's motor vehicle (Count 3)), a misdemeanor. The Court dismissed counts 1 and 2 of the misdemeanor complaint filed against Respondent. The court suspended imposition of sentence and placed Respondent on summary probation for a period of 12 months subject to terms and conditions including but not limited to: obeying all laws; not driving a motor vehicle without a valid driver's license or without the minimum liability insurance required by law; performing 30 days community labor with credit for 2 days; and paying a restitution fine, and fees.
- 6. The conviction, as described in Paragraph 3 above, bears a substantial relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications, functions, or duties of a real estate licensee.
- 7. The crime for which Respondent was convicted, as described in Paragraph 3 above, constitutes 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 OF ACCUSATION

## (FAILURE TO REPORT FELONY CHARGE AND CONVICTION)

8. The Complainant realleges and incorporates by reference all of the allegations contained in paragraphs 1 through 7 above, with the same force and effect as though fully set forth herein.

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- 9. Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, "The bringing of a criminal complaint, information, or indictment charging a felony against the licensee," and "The conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any felony or misdemeanor" to the Department within thirty (30) days of the of the date of the bringing of the indictment or the charging of a felony, and of the conviction. Respondent failed to report in writing to the Department the bringing of a criminal complaint charging a felony against him as alleged in Paragraph 3 above, and failed to report his conviction described in Paragraph 5 above, within thirty (30) days of the bringing of a criminal complaint charging a felony against him and of his conviction.
- 10. Respondent's failure to timely report the bringing of the felony complaint and his conviction violates Code section 10186.2 and constitutes cause under Code sections 10186.2 and 10177(d) for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

## **COSTS**

## (COSTS OF INVESTIGATION AND ENFORCEMENT)

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

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EFORE, Complainant prays that a hearing be conducted on the allegations of this that upon proof thereof, a decision be rendered imposing disciplinary action against and license rights of Respondent PETER YOO under the Real Estate Law, for the gation and enforcement as permitted by law, and for such other and further relief as under other applicable provisions of law.

11, 2024 \_, at Los Angeles, California.

Supervising Special Investigator

YOO laebong Lee arson