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FILED

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BUREAU OF REAL ESTATE

By *A. Delois*

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9 **BEFORE THE BUREAU OF REAL ESTATE**
10 **STATE OF CALIFORNIA**

11 * * *

12 In the Matter of the Accusation of) No. H-40882 LA
13 ALEJANDRO T PEREZ-MUNOZ,) FIRST AMENDED
14 Respondent.) ACCUSATION
15)

16 This Accusation amends the Accusation filed on December 8, 2017. The
17 Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California,
18 for cause of Accusation against ALEJANDRO T PEREZ-MUNOZ, a.k.a. ALEJANDRO
19 TLALOC PEREZ-MUNOZ, a.k.a. ALEJANDRO PEREZ MUNOZ ("Respondent"), is
20 informed and alleges as follows:

21 1.

22 The Complainant, Veronica Kilpatrick, acting in her official capacity as a
23 Supervising Special Investigator of the State of California, makes this Accusation against
24 ALEJANDRO T PEREZ-MUNOZ.

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6.

On or about November 4, 2015, Respondent pled guilty and was convicted in the Superior Court of California, County of Riverside, Case No. INF1500849, for violation of California Vehicle Code Section 23152(b) with enhancement under Vehicle Code Section 23578 (Driving With A Blood Alcohol Level Of 0.08 Percent Or Higher), a felony. Respondent was placed on 36 months of formal probation, and ordered to serve 180 days in the custody of Riverside County Sheriff's Department and pay fines and fees. Additionally, Respondent was ordered to complete an 18 month Offender Drinking Driver Program.

7.

On or about June 24, 2016, Respondent pled guilty and was convicted in the Superior Court of California, County of Los Angeles, Case No. SA091721, for violation of California Vehicle Code Section 23152(a) with enhancement under Vehicle Code Section 23550 (Driving Under The Influence), a felony. Respondent was placed on 60 months of probation, and ordered to serve 61 days in jail and pay fines and fees. Additionally, Respondent was ordered to complete a 30 month alcohol education program, Respondent's driver's license was revoked for four years, and Respondent was declared to be a Habitual Traffic Offender for four years.

8.

The convictions described in Paragraphs 6 and 7 bear 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.

9.

The crimes of which Respondent was convicted, as described in Paragraphs 6 and 7 above, constitute cause under Sections 490 and 10177(b)(1) of the Code for the suspension or revocation of all the licenses and license rights of Respondent under the Real Estate Law.

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10.

Code Section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Bureau 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.

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 Respondent ALEJANDRO T PEREZ-MUNOZ under the Real Estate Law, for the cost 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 San Diego, California

this 2nd day of February, 2018


Veronica Kilpatrick
Supervising Special Investigator

cc: ALEJANDRO T PEREZ-MUNOZ
HSCA, Inc. DBA HomeSmart Professionals and Smart Referral Network
Veronica Kilpatrick
Sacto.