1 2 3 4 5 6 7	LAURENCE D. HAVESON, Counsel (SBN 152631) Department of Real Estate 320 West 4th Street, Suite 350 Los Angeles, California 90013-1105 Telephone: (213) 576-6982 Direct: (213) 576-6854 Fax: (213) 576-6917 Email: Laurence.Haveson@dre.ca.gov Attorney for Complainant		
8	BEFORE THE DEPARTMENT OF REAL ESTATE		
9	STATE OF CALIFORNIA		
10	* * *		
11	In the Matter of the Accusation of No. H-42802-LA		
12	CHRISTOPHER RAMOS, <u>ACCUSATION</u>		
13	Respondent.		
14	The Complainant, Ray Dagnino, a Supervising Special Investigator for the Department of		
15	Real Estate ("Department" or "DRE") of the State of California, for cause of Accusation against		
16	CHRISTOPHER RAMOS ("Respondent"), is informed and alleges in his official capacity as		
17	follows:		
18	1. The Complainant, Ray Dagnino, acting in his official capacity as a Supervising		
19	Special Investigator, makes this Accusation against Respondent.		
20	2. Respondent presently has license rights under the Real Estate Law, Part 1 of Division		
21	4 of the California Business and Professions Code ("Code"), as a restricted real estate salesperson		
22	("RRES") (DRE License ID 01942061).		
23	PRIOR DISCIPLINE: DRE CASE NO. H-39539-LA		
24	3. On or about July 16, 2014, in DRE Case No. H-39539-LA, the DRE filed a		
25	Stipulation and Waiver ("Stipulation"), agreed to by Respondent, and in which the Real Estate		
26	Commissioner ("Commissioner") agreed not to file a Statement of Issues against Respondent. The		

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Commissioner adopted the Stipulation in an Order dated July 10, 2014 ("Order"), and granted

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Respondent a RRES license subject to conditions, limitations, and restrictions, including but not limited to the following:

- "1. The license shall not confer any property right in the privileges to be exercised, including the right of renewal, and the Real Estate Commissioner may by appropriate order suspend the right to exercise any privileges granted under this restricted license in the event of:
- "a. The conviction of Respondent (including a plea of nolo contendere) to a crime that bears a substantial relationship to Respondent's fitness or capacity as a real estate licensee.

"[¶] . . . [¶]

"4. Respondent shall notify the Real Estate Commissioner in writing within 72 hours of any arrest by sending a certified letter to the Real Estate Commissioner at the Bureau of Real Estate, Post Office Box 137013, Sacramento, CA 95813-7013. The letter shall set forth the date of Respondent's arrest, the crime for which Respondent was arrested, and the name and address of the arresting law enforcement agency. Respondent's failure to timely file written notice shall constitute an independent violation of the terms of the restricted license and shall be grounds for the suspension or revocation of that license."

On July 24, 2014, pursuant to the Stipulation, the DRE issued a RRES license to Respondent.

FIRST CAUSE OF ACCUSATION

(CRIMINAL CONVICTIONS)

4. On or about September 22, 2009, in Los Angeles County Superior Court, Case No. 9FF02468, Respondent was convicted and found guilty based on his plea of no contest to violating Vehicle Code section 23153(b) (driving with a measurable blood alcohol causing injury), a misdemeanor. The court suspended imposition of sentence and placed Respondent on summary probation for a period of 36 months subject to terms and conditions including but not limited to: paying a fine, assessments, fees, a surcharge, and a restitution fine; serving 13 days of jail time, with credit for three days; completing a three-month licensed first-offender alcohol and other drug education and counseling program; and enrolling in an AB-541 program. On or about September 24, 2010, Respondent's probation was revoked. On or about March 23, 2011, Respondent's probation was reinstated with the modification that the required fine be converted into 13 days of community labor with credit for three days.

- 5. On or about January 11, 2011, in Los Angeles County Superior Court, Case No. 9DY07501, Respondent was convicted and found guilty based on his plea of nolo contendere to violating Vehicle Code section 14601.2(a) (driving when privilege suspended for prior DUI conviction), a misdemeanor. The court suspended imposition of sentence and placed Respondent on summary probation for a period of 36 months subject to terms and conditions including but not limited to: paying a fine, assessments, fees, and a restitution fine; and not operating any vehicle without an installed ignition interlock device for a period of one (1) year. On February 16, 2012, Respondent's probation was revoked for failure to pay a fine. On March 22, 2012, Respondent's probation was continued with the modification that Respondent serve 30 days jail time with credit for three (3) days.
- 6. On or about March 23, 2011, in Los Angeles County Superior Court, Case No. 0FF03128, Respondent was convicted and found guilty based on his plea of nolo contendere to violating Vehicle Code section 14601.5(a) (driving on a suspended license), a misdemeanor. The court suspended imposition of sentence and placed Respondent on summary probation for a period of 36 months subject to terms and conditions including but not limited to: paying a fine, assessments, a surcharge, fees, costs, and a restitution fine.
- 7. On or about April 24, 2023, in Orange County Superior Court, Case No. 22WM04159, Respondent was convicted based on his guilty plea for violation of Penal Code sections 23152(a) (driving under the influence of alcohol), 23152(b) (driving with blood alcohol of .08% or more), and 415(1) (challenging another to fight in a public place), all of which are misdemeanors. The court suspended imposition of sentence and placed Respondent on informal probation for a period of four (4) years subject to terms and conditions including but not limited to: paying a fine plus penalty assessments, a restitution fine, a penalty, and fees; completing a three-month Level 1 First Offender Alcohol Program; and completing Victim Impact Counseling.
- 8. The convictions, as described in Paragraphs 4 through 7 above, 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 for which Respondent was convicted, as described in Paragraph 7 above, when considered in conjunction with the crimes described in paragraphs 4 through 6, constitute 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

(VIOLATION OF TERMS CONTAINED IN ORDER GRANTING A RESTRICTED LICENSE)

- 10. The Complainant realleges and incorporates by reference all of the allegations contained in paragraphs 1 through 9 above, with the same force and effect as though fully set forth herein.
- 11. On or about April 9, 2022, Respondent was arrested by the Costa Mesa Police Department for violation of Penal Code sections 243.4(e)(1) (touch person intimately against will for sexual arousal), and 23152(b) (driving with blood alcohol of .08% or more), both of which are misdemeanors.
- 12. On or about April 24, 2023, in Orange County Superior Court, Case No. 22WM04159, Respondent was convicted based on his guilty plea for violation of Penal Code sections 23152(a) (driving under the influence of alcohol), 23152(b) (driving with blood alcohol of .08% or more), and 415(1) (challenging another to fight in a public place), all of which are misdemeanors.
- Respondent a RRES license, Respondent was required to notify the Commissioner in writing by certified letter within seventy-two (72) hours of his arrest on April 9, 2022. However, Respondent failed to notify the Commissioner in writing within seventy-two (72) hours of his arrest on April 9, 2022. Respondent's failure to timely file such written notice is an independent violation of the terms of the restricted license and constitutes grounds for the suspension or revocation of that license.
- 14. Respondent's conviction on April 24, 2023, in Orange County Superior Court, Case No. 22WM04159, 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.

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1	15. Respondent's failure to comply with the terms and conditions set forth in Paragraphs
2	1 and 4 the Order constitutes cause pursuant to Code section 10177(k), for the suspension or
3	revocation of Respondent's restricted real estate salesperson license and license rights under the
4	Real Estate Law.
5	<u>COSTS</u>
6	(COSTS OF INVESTIGATION AND ENFORCEMENT)
7	16. Code section 10106, provides, in pertinent part, that in any order issued in resolution
8	of a disciplinary proceeding before the Department of Real Estate, the Commissioner may request
9	the administrative law judge to direct a licensee found to have committed a violation of this part to
10	pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.
11	WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this
12	Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against
13	all the licenses and license rights of Respondent CHRISTOPHER RAMOS under the Real Estate
14	Law, for the costs of investigation and enforcement as permitted by law, and for such other and
15	further relief as may be proper under other applicable provisions of law.
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17	Dated at Los Angeles, California this 29th day of January , 2024.
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20	Ray G. Dagnino
21	Ray Dagnino Supervising Special Investigator
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23	cc: BRYANT CHRISTOPHER MARTINEZ
MAXRES Inc Ray Dagnino	Ray Dagnino
25	Sacto.
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