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FILED

MAR 30 2016

BUREAU OF REAL ESTATE

By *Q. Delorio*

8 BUREAU OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of) No.H-04783 SD
12)
13 VINCINA G. MORINEAU,) ACCUSATION
14) Respondent.)

15 The Complainant, Veronica Kilpatrick, a Supervising
16 Special Investigator of the State of California, for cause of
17 accusation against VINCINA G. MORINEAU, alleges as follows:

18 1. The Complainant, Veronica Kilpatrick, a Supervising
19 Special Investigator of the State of California, makes this
20 Accusation in her official capacity.

21 2. VINCINA G. MORINEAU (hereinafter referred to as
22 "Respondent") is presently licensed and/or has license rights
23 under the Real Estate Law (Part 1 of Division 4 of the Business
24 and Professions Code, hereinafter referred to as the "Code").

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26 Acusation of Vincina G. Morineau

1 3. Respondent was licensed by the Bureau of Real
2 Estate of the State of California as a real estate broker
3 effective February 2, 2007. The license expired March 10, 2015.
4 Respondent has a two year renewal right.

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6 4. On or about September 18, 2013, in the US District
7 Court, Southern District of California, case number: 11-cr-
8 03486-JAH-14, Respondent was convicted of violating 18 USC 1343
9 (wire fraud).

10 5. The above referenced matter bears a substantial
11 relationship to the qualifications, functions, or duties of a
12 real estate licensee, Title 10, Chapter 6, Section 2910,
13 California Administrative Code.

14 6. Respondent's conviction alleged in Paragraph 4 is
15 cause under Code Sections 490 and 10177(b) for suspension or
16 revocation of all licenses and license rights of Respondent under
17 the Real Estate Law.

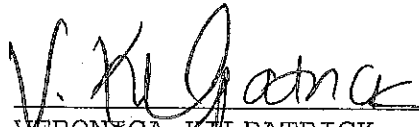
18 Business and Professions Code Section 10106 provides,
19 in pertinent part, that in any order issued in resolution of a
20 disciplinary proceeding before the Bureau, the Commissioner may
21 request the administrative law judge to direct a licensee found
22 to have committed a violation of this part to pay a sum not to
23 exceed the reasonable costs of the investigation and enforcement
24 of the case.
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27 Accusation of Vincina G. Morineau

1 WHEREFORE, Complainant prays that a hearing be
2 conducted on the allegations of this Accusation and that upon
3 proof thereof, a decision be rendered imposing disciplinary
4 action against all licenses and license rights of Respondent
5 VINCINA G. MORINEAU, for the cost of investigation and
6 enforcement as permitted by law, under the Real Estate Law (Part
7 1 of Division 4 of the Business and Professions Code) and for
8 such other and further relief as may be proper under other
9 applicable provisions of law.

10 Dated at San Diego, California,
11 this 11th day of March, 2016.

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14 VERONICA KILPATRICK
15 Supervising Special Investigator
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24 cc: Vincina G. Morineau
25 Veronica Kilpatrick
26 Sacto.

27 Accusation of Vincina G. Morineau