## FILED

1	JOHN VAN DRIEL, Counsel (SBN 84056)	February 10, 2014
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8	BEFORE THE BUREAU OF REAL ESTATE	
9	STATE OF CALIFORNIA	
10	* * *	
11	In the Matter of the Accusation of	NO 11 6079 SAC
12	in the Matter of the Accusation of	) NO. H-6078 SAC
1 2	AMY N. SCHLOEMANN,	) <u>ACCUSATION</u>
13	Respondent.	)
14		
15		
16	Complainant, Tricia Sommers, a Deputy Real Estate Commissioner of the State of	
17	California, for cause of Accusation against AMY N. SCHLOEMANN (hereinafter	
18	"Respondent"), is informed and alleges as follows:	
19	1	
20	Respondent is presently licensed and/or has license rights under the Real Estate	
21	Law, Part 1 of Division 4 of the Business and Professions Code (hereinafter "Code") as a real	
22	estate broker.	
23	2	
24	Complainant makes this Accusation against Respondent in her official capacity.	
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On or about June 12, 2013, in the United States District Court, Northern District of California, Respondent was convicted of a violation of 18 U.S.C. Section 1349 (conspiracy to commit wire fraud), a felony and a crime which is substantially related under Section 2910, Title 10, California Code of Regulations to the qualifications, functions or duties of a real estate licensee.

The facts alleged above constitute cause under Sections 490 and/or 10177(b) of the Code for suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

## **COST RECOVERY**

Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Bureau, 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 revoking all licenses and license rights of Respondent under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code), for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under the provisions of law.

TRICIA SOMMERS

Deputy Real Estate Commissioner

Dated at Sacramento, California,

this  $\frac{7}{1}$  day of January, 2014.