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FILED

MAR 11 2016

BUREAU OF REAL ESTATE

By B. dew

BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

11 In the Matter of the Accusation of

12 ANTHONY JASON SALCEDO,

13 Respondent.

No. H-6371 SAC

ACCUSATION

14 The Complainant, TRICIA PARKHURST, in her official capacity as a
15 Supervising Special Investigator of the Bureau of Real Estate ("Bureau") of the State of
16 California, brings this Accusation against Respondent ANTHONY JASON SALCEDO
17 ("Respondent"), and is informed and alleges as follows:

18 1.

19 Respondent is presently licensed and/or has license rights under the Real Estate
20 Law (Part 1 of Division 4 of the California Business and Professions Code) ("Code") as a real
21 estate salesperson.

22 2.

23 On or about November 12, 2015, in the United States District Court, Eastern
24 District of California, Case No. 2:11CR00353-02, Respondent was convicted, upon a jury verdict
25 of guilty, of one count of Title 18 of the United States Code Section 1349 (conspiracy to commit
26 mail fraud), and three counts of Title 18 of the United States Code Section 1341 (mail fraud), all
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1 felonies and crimes which bear a substantial relationship to the qualifications, functions, or
2 duties of a real estate licensee pursuant to Section 2910, Title 10, California Code of Regulations.

3 3.

4 The facts identified in paragraph 2, constitutes cause under Sections 490
5 (conviction of crime) and 10177(b) (conviction of substantially related crime) for the suspension
6 or revocation of all licenses and license rights of Respondent under the Real Estate Law.

7 COST RECOVERY

8 4.

9 Section 10106 of the Code provides, in pertinent part, that in any order issued in
10 resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the
11 Administrative Law Judge to direct a licensee found to have committed a violation of this part to
12 pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

13 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
14 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary
15 action against all licenses and license rights of Respondent under the Code, for the cost of
16 investigation and enforcement as permitted by law, and for such other and further relief as may
17 be proper under the provisions of law.

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20 TRICIA PARKHURST
21 Supervising Special Investigator

22 Dated at Sacramento, California,
23 this 9th day of March, 2016

24 DISCOVERY DEMAND

25 Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the Bureau of Real
26 Estate hereby makes demand for discovery pursuant to the guidelines set forth in the
27 *Administrative Procedure Act*. Failure to provide Discovery to the Bureau of Real Estate may
result in the exclusion of witnesses and documents at the hearing or other sanctions that the
Office of Administrative Hearings deems appropriate.