

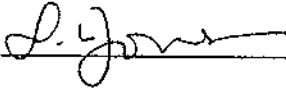
FILED

November 26, 2012

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DEPARTMENT OF REAL ESTATE

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By 

7 BEFORE THE DEPARTMENT OF REAL ESTATE

8 STATE OF CALIFORNIA

9 * * *

| | | | |
|----|------------------------------------|---|-------------------|
| 10 | In the Matter of the Accusation of |) | |
| 11 | |) | H-11482 SF |
| 12 | ABRAHAM VALENTINO, |) | |
| 13 | |) | <u>ACCUSATION</u> |
| | Respondent. |) | |
| | |) | |

14 The Complainant, ROBIN S. TANNER, in her official capacity as a Deputy Real
15 Estate Commissioner of the State of California, for cause of Accusation against ABRAHAM
16 VALENTINO (hereinafter "Respondent"), is informed and alleges as follows:

17 1

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

21 2

22 On or about May 24, 2012, in the United States District Court, Northern District
23 of California, in Case No. CR-11-00403-001 JSW, Respondent was convicted of violating Title
24 18, Section 1343 of the United States Code (wire fraud), and Title 18, Section 1957 of the
25 United States Code (money laundering), both felonies and crimes which bear a substantial
26 relationship under Section 2910, Title 10, of the California Code of Regulations, to the
27 qualifications, functions, or duties of a real estate licensee.

The facts alleged in paragraph 2, above, constitute cause under Sections 490 (conviction of crime) and 10177(b) (conviction of crime-substantially related to qualifications, functions or duties of a real estate licensee) of the Code, for the 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 Department, the Commissioner may request the Administrative Law Judge to direct a licensee found to have committed a violation of this part (Part 1 of Division 4 of the Code) 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 licenses and license rights of Respondent under the Real Estate Law (Part 1 of Division 4 of the Code), for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other provisions of law.


ROBIN S. TANNER
Deputy Real Estate Commissioner

Dated at Oakland, California,
this 31st day of October, 2012.