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FILED

JAN 2 2013

DEPARTMENT OF REAL ESTATE

By K. D. Contreras

9 BEFORE THE
10 DEPARTMENT OF REAL ESTATE
11 STATE OF CALIFORNIA

12 * * *

13 In the Matter of the Accusation of)
14)
15 NORMA VALDOVINOS,)
16)
17 Respondent.)

NO. H-11496 SF

ACCUSATION

18 The Complainant, Robin S. Tanner, a Deputy Real Estate Commissioner of the
19 State of California, for cause of Accusation against NORMA VALDOVINOS (hereinafter
20 "Respondent"), is informed and alleges as follows:

21 1.

22 The Complainant makes this Accusation against Respondent in her official
23 capacity.

24 2.

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

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1 3.

2 On or about May 11, 2011, in the San Jose Division of the United States
3 District Court, Case No. CR11-00308, Respondent was indicted on the following felony
4 allegations: 18 U.S.C. § 1349 (conspiracy to commit bank fraud); 18 U.S.C. § 1344 (bank
5 fraud); 18 U.S.C. § 2 (aiding and abetting); 18 U.S.C. § 1014 (making a false statement to a
6 bank); 18 U.S.C. § 1956(h) (conspiracy to commit money laundering); 18 U.S.C. § 1957
7 (engaging in monetary transactions using criminally derived property); and 18 U.S.C. §§
8 1956(a)(1)(A)(I) and 1956(a)(1)(B)(I) (money laundering). A no-bail arrest warrant was issued
9 as to Respondent.

10 4.

11 On or about May 18, 2011, Respondent was arrested pursuant to the May 11,
12 2011 arrest warrant. Based upon information and belief, Respondent was released from Federal
13 detention some time between May 18, 2011 and June 5, 2011.

14 5.

15 On or about June 6, 2011, a second arrest warrant issued as to Respondent. She
16 was designated by the San Jose Division of the United States District Court as a fugitive at law
17 on or about June 15, 2011.

18 6.

19 On or about October 3, 2012, Respondent was indicted on additional counts to
20 the allegations delineated in Paragraph 3. A no-bail arrest warrant was again issued for
21 Respondent's arrest.

22 7.

23 On November 26, 2012, a diligent search was made of the records of the
24 Department of Real Estate (hereinafter "Department"), relating to Respondent's Real Estate
25 Salesperson License No. 01304718. As a result of said search, no record was discovered having
26 been received from Respondent notifying the Department, in writing, of any arrest, conviction,
27 indictment, or license disciplinary action.

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8.

The facts alleged above indicate Respondent's failure to comply with Sections 10186.2(a)(1)(A) and 10186.2(a)(2) (failure to report in writing to the Department the bringing of an indictment or information charging a felony against Respondent within 30 days) of the Code, and constitute cause under Section 10177(d) (willful disregard or violation of the Real Estate Law; Part 1 of Division 4 of the Business and Professions Code) for revocation of all licenses and license rights of Respondent under said Real Estate Law.

9.

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 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 Business and Professions Code), 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 28th day of December, 2012.