

FILED

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BUREAU OF REAL ESTATE

By SB

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BEFORE THE BUREAU OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of)	
)	No. H-11710 SF
RAQUEL RAMIREZ,)	<u>ACCUSATION</u>
)	
Respondent.)	
)	

The Complainant, ROBIN S. TANNER, acting in her official capacity as a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against RAQUEL RAMIREZ ("Respondent"), is informed and alleges as follows:

1.

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

CRIMINAL CONVICTION

2.

On or about August 12, 2013, in the United States District Court for the Northern District of California, Case Number CR 000465-3 DLJ, Respondent was convicted of violating title 18 United States Code section 1349 (conspiracy to commit bank fraud), a felony which bears a substantial relationship under section 2910, title 10, California Code of Regulations to the qualifications, functions or duties of a real estate licensee.

1 3.

2 The facts alleged above in Paragraph 2 constitute grounds under sections 490 and
3 10177(b) of the Business and Professions Code ("the Code") for suspension or revocation of all
4 licenses and license rights of Respondent under the Real Estate Law.

5 FAILURE TO NOTIFY BUREAU OF CRIMINAL CHARGES AND CONVICTIONS

6 4.

7 A diligent search was made of the records of the Bureau of Real Estate
8 ("Bureau") relating to Respondent's Real Estate Broker License No. 01368418. As a result of
9 said search, no record was discovered having been received from Respondent notifying the
10 Bureau, in writing, of any arrest, conviction, indictment or license disciplinary action occurring
11 on or after January 1, 2012.

12 5.

13 The facts alleged above in Paragraph 4 indicate Respondent's failure to comply
14 with sections 10186.2(a)(1)(A), 10186.2(a)(1)(B) and 10186.2(a)(2) (failure to report in writing
15 to the Bureau of an indictment or information charging a felony and/or a conviction of any
16 felony or misdemeanor against Respondent within 30 days) of the Code, which constitutes
17 cause under section 10177(d) (willful disregard or violation the Real Estate Law), for revocation
18 of all licenses and license rights of Respondent under said Real Estate Law.

19 COST RECOVERY

20 6.

21 The Bureau will seek to recover costs of the investigation and prosecution of this
22 case pursuant to section 10106 of the Code which provides, in pertinent part, that in any order
23 issued in resolution of a disciplinary proceeding before the Bureau, the commissioner may
24 request the administrative law judge to direct a licensee found to have committed a violation of
25 this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of
26 the case.

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1 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
2 of this Accusation and that upon proof thereof, a decision be rendered revoking all licenses and
3 license rights of Respondent under the Real Estate Law, for the cost of investigation and
4 enforcement as permitted by law, and for such other and further relief as may be proper under
5 other provisions of law.

6
7 
8 _____
9 ROBIN S. TANNER
10 Deputy Real Estate Commissioner

11 Dated at Oakland, California, on
12 this 16th day of May, 2014.

13
14
15 DISCOVERY DEMAND

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