

FILED

JUN 26 2014

BUREAU OF REAL ESTATE

By S. B. K.

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8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)
12)
13 RONALD VERNON SCHWARTZ,)
14 Respondent.)

No. H-11728 SF
ACCUSATION

15 The Complainant, ROBIN S. TANNER, acting in her capacity as a Deputy Real
16 Estate Commissioner of the State of California, for cause of Accusation against RONALD
17 VERNON SCHWARTZ (Respondent), is informed and alleges as follows:

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19 Complainant makes this Accusation against Respondent in her official capacity.

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21 At all times herein mentioned, Respondent was and is presently licensed and/or
22 has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and
23 Professions Code (the Code) as a real estate broker.

24 3

25 On or about April 4, 2014, in the Superior Court of the State of California, County
26 of Contra Costa, Case No. 05 130100-1, Respondent was convicted of six counts of violating
27 Section 288(a) of the California Penal Code (lewd act w/child under 14 years old), each a felony

1 and crimes which bear a substantial relationship under Section 2910, Title 10, California Code of
2 Regulations, to the qualifications, functions, or duties of a real estate licensee.

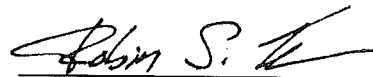
3 4

4 The facts alleged in Paragraph 3, above, constitute cause under Section 10177(b)
5 (further grounds for disciplinary action- conviction of crime) and Section 490 (conviction
6 substantially related crime) of the Code for suspension or revocation of Respondent's license
7 under the Real Estate Law.

8 5

9 Section 10106 of the Code provides, in pertinent part, that in any order issued
10 in 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 reasonable
16 costs of investigation and prosecution of this case, including agency attorney's fees and for such
17 other and further relief as may be proper under provisions of law.

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21 ROBIN S. TANNER
22 Deputy Real Estate Commissioner

23 Dated at Oakland, California

24 this 18th day of June, 2014.