

FILED

MAR 26 2015

BUREAU OF REAL ESTATE

By S. Black

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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 KELLY WILLIAM NG,) No. H-11831 SF
13 Respondent.) ACCUSATION
14

15 The Complainant, Robin S. Tanner, in her official capacity as a Deputy Real
16 Estate Commissioner of the State of California, brings this Accusation against KELLY
17 WILLIAM NG ("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 Business and Professions Code ("Code")) as a real estate broker.

21 2

22 On or about March 5, 2014, in the United States District Court, Northern
23 District of California, Case No. CR-13-00650-002 PJH, Respondent was convicted of violating
24 approximately 20 counts of Section 5324(a) of Title 31 of the United States Code (the structuring
25 of transactions to evade reporting requirements), all felonies which bear a substantial relationship
26 under Section 2910, Title 10, of the California Code of Regulations to the qualifications,
27 functions or duties of a real estate licensee.

The facts alleged at Paragraph 2, above, constitute cause under Section 490 (conviction of a substantially related crime) and/or Section 10177(b) (conviction of crime) of the Code for 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 Bureau, the Real Estate 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 Code, for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under the provisions of law.


ROBIN S. TANNER
Deputy Real Estate Commissioner

Dated at Oakland, California,
this 23rd day of February, 2015

DISCOVERY DEMAND

Pursuant to Sections 11507.6, et seq. of the Administrative Procedure Act, the Bureau of Real Estate hereby makes demand for discovery pursuant to the guidelines set forth in the 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