

FILED

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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 MINERVA SANCHEZ,)
13 Respondent.)

No. H-11838 SF

ACCUSATION

14 The Complainant, ROBIN S. TANNER, a Deputy Real Estate Commissioner of
15 the State of California, for cause of Accusation against MINERVA SANCHEZ, (Respondent), is
16 informed and alleges as follows:

17 1

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

19 2

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

23 3

24 On or about February 17, 2015, in the United States District Court, Eastern
25 District of California, Case No. 1:13 CR 00438-001, Respondent was convicted of violating 18
26 USC 1349 (conspiracy to commit bank fraud), a felony and a crime which bears a substantial
27 relationship under Section 2910, Title 10, California Code of Regulations, to the qualifications,

1 functions, or duties of a real estate licensee.

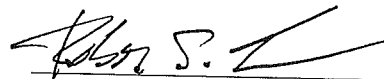
2 4

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

7 5

8 Section 10106 of the Code provides, in pertinent part, that in any order issued
9 in resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the
10 administrative law judge to direct a licensee found to have committed a violation of this part to
11 pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

12
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.

18
19 

20 ROBIN S. TANNER
21 Deputy Real Estate Commissioner

22 Dated at Oakland, California

23 this 27th day of March, 2015.