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FILED

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BUREAU OF REAL ESTATE

By B. Nicholas

8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)

12 ANTHONY G. KESLINKE, JR.,)

13 Respondent.)

No. H-12130 SF

ACCUSATION

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15 The Complainant, ROBIN S. TANNER, acting in her official capacity as a
16 Supervising Special Investigator of the State of California, for cause of Accusation against
17 ANTHONY G. KESLINKE, JR., (Respondent), is informed and alleges as follows:

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

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23 On or about April 28, 2016, in the United States District Court, Northern District
24 of California, Case No. 4:14-CR-00237-JST, Respondent was convicted of violating 18 U.S.C. §
25 1349 (Conspiracy to Commit Bank Fraud) and 18 U.S.C. § 1956 (h) (Conspiracy to Launder
26 Monetary Instruments), both felonies which bear a substantial relationship under Section 2910,

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1 Title 10, Chapter 6, California Code of Regulations (Regulations), to the qualifications, functions
2 or duties of a real estate licensee.

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4 A diligent search was made of the records of the Bureau, relating to
5 Respondent's real estate broker license No. 01075906. As a result of said search, no written
6 record was discovered of Respondent notifying the Bureau of any conviction.

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8 The facts alleged above, in Paragraph 2, constitutes grounds under Sections 490
9 and 10177(b) (conviction of a crime) of the Code for suspension or revocation of all licenses
10 and license rights of Respondent under the Real Estate Law.

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12 The facts alleged above, in Paragraph 3, constitutes a violation of Section
13 10186.2 (a)(1)(B) and Section 10186.2 (a) (2) (failure to report in writing, conviction within 30
14 days) of the Code, and are grounds for the suspension or revocation of all licenses and license
15 rights of Respondent under Sections 10186.2 (b) and 10177(d) (willful disregard or violation of
16 Real Estate Law) of the Code.

17 COST RECOVERY

18 6

19 Section 10106 of the Code provides, in pertinent part, that in any order issued in
20 resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the
21 Administrative Law Judge to direct a licensee found to have committed a violation of this part to
22 pay a sum not to exceed the reasonable costs of the investigation and enforcement of 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.

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8 ROBIN S. TANNER
9 Supervising Special Investigator

10 Dated at Oakland, California, on
11 this 14th day of November, 2017.

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13 DISCOVERY DEMAND

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