

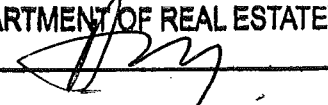
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**FILED**

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AUG - 8 2012

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DEPARTMENT OF REAL ESTATE  
BY: 

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of ) No. H-38327 LA  
12 )  
13 SUSHAMA D. LOHIA, ) A C C U S A T I O N  
14 ) Respondent. )

15 The Complainant, Robin Trujillo, a Deputy Real Estate  
16 Commissioner of the State of California, acting in her official  
17 capacity, for cause of Accusation against SUSHAMA D. LOHIA aka  
18 Sushama Devi Lohia ("Respondent") alleges as follows:

19 1.

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

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1 (CRIMINAL CONVICTIONS)

2 2.

3 On or about April 20, 2012, in the Superior Court of  
4 California, County of Orange, in Case No. 10CF0477, Respondent  
5 was convicted of violating 12 counts of Penal Code Section  
6 182(a)(1)(Conspiracy to Commit a Crime), 25 counts of Penal Code  
7 Section 470(d) (Forgery), 14 counts of Penal Code Section  
8 487(a) (Grand Theft), four counts of Penal Code Section  
9 530.5(a) (Identity Theft), four counts of Penal Code Section  
10 115(a) (Recording a False or Forged Instrument), and two counts  
11 of Penal Code Section 470(a) (Forgery), all with the enhancement  
12 of Penal Code Section 186.11(a)(2) (Aggravated White Collar Crime  
13 over \$500,000), all felonies. These crimes are substantially  
14 related to the qualifications, functions or duties of a real  
15 estate licensee under Section 2910, Title 10, Chapter 6,  
16 California Code of Regulations.

17 3.

18 On or about April 20, 2012, in the Superior Court of  
19 California, County of Orange, in Case No. 11ZF0120, Respondent  
20 was convicted of violating two counts of Revenue and Taxation  
21 Code Section 19705(a)(1) (File False Tax Return), and eight  
22 counts of Revenue and Taxation Code Section 19706 (Willful  
23 Failure to File or Make Fraudulent Tax Return), both felonies.  
24 These crimes are substantially related to the qualifications,  
25 functions or duties of a real estate licensee under Section  
26 2910, Title 10, Chapter 6, California Code of Regulations.

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1 4.

2 The crimes of which Respondent was convicted, as  
3 described above, constitute cause under Sections 490 and  
4 10177(b) of the Business & Professions Code for the suspension  
5 or revocation of the license and license rights of Respondent  
6 under the Real Estate Law.

7 5.

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

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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 the licenses and license rights of Respondent, SUSHAMA D. LOHIA, under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code), for the costs of investigation and enforcement as provided by law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California: July 26, 2012.

  
\_\_\_\_\_  
Robin Trujillo  
Deputy Real Estate Commissioner

cc: Sushama D. Lohia  
Robin Trujillo  
Sacto.