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FILED

APR 23 2013

DEPARTMENT OF REAL ESTATE
BY: *[Signature]*

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of) No. H-38825 LA
12 CELIA GALLARDO,)
13 Respondent.) A C C U S A T I O N
14 _____)

15 The Complainant, Robin Trujillo, a Deputy Real Estate
16 Commissioner of the State of California for cause of Accusation
17 against CELIA GALLARDO, a.k.a. Celia Zagha ("Respondent")
18 alleges as follows:

19 1.

20 The Complainant, Robin Trujillo, a Deputy Real Estate
21 Commissioner of the State of California, makes this Accusation
22 in her official capacity.

23 2.

24 Respondent is presently licensed and/or has license
25 rights under the Real Estate Law, Part 1 of Division 4 of the
26 California Business and Professions Code as a real estate
27 salesperson.

1 3.

2 (GUILTY PLEA)

3 On or about October 10, 2012, in the United States
4 District Court, Central District of California, in Case No. CR
5 12-640-DDP, Respondent pled guilty to violating 18 U.S.S.
6 §1343 (wire fraud), a felony.

7 4.

8 (FAILURE TO REPORT)

9 Respondent did not report in writing to the
10 Department of Real Estate ("Department"), the bringing of the
11 indictment charging the aforementioned felony against her,
12 within 30 days of the bringing of the indictment (filed July
13 10, 2012); neither did Respondent report in writing to the
14 Department her plea of guilty to the aforementioned felony
15 (entered October 10, 2012). Respondent's failure to report the
16 indictment and/or guilty plea constitutes cause for discipline
17 under Business and Professions Code Section 10186.2¹ of the
18

19 ¹ Pursuant to Business and Professions Code 10186.2: (a) (1) A licensee shall
20 report any of the following to the department: (A) The bringing of an
21 indictment or information charging a felony against the licensee. (B) The
22 conviction of the licensee, including any verdict of guilty, or plea of
23 guilty or no contest, of any felony or misdemeanor. (c) Any disciplinary
24 action taken by another licensing entity or authority of this state or of
25 another state or an agency of the federal government. (2) The report
26 required by this subdivision shall be made in writing within 30 days of the
27 date of the bringing of the indictment or the charging of a felony, the

1 license and license rights of Respondent under the Real Estate
2 Law.

3 5.

4 California Business and Professions Code Section
5 10106 provides, in pertinent part, that in any order issued in
6 resolution of a disciplinary proceeding before the department,
7 the Commissioner may request the administrative law judge to
8 direct a licensee found to have committed a violation of this
9 part to pay a sum not to exceed the reasonable costs of
10 investigation and enforcement of the case.

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26 conviction, or the disciplinary action. (b) Failure to make a report
27 required by this section shall constitute a cause for discipline.

1 WHEREFORE, Complainant prays that a hearing be
2 conducted on the allegations of this Accusation and that upon
3 proof thereof, a decision be rendered imposing disciplinary
4 action against all licenses and/or license rights under the
5 Real Estate Law (Part 1 of Division 4 of the California
6 Business and Professions Code) of Respondent CELIA GALLARDO,
7 for the cost of investigation and enforcement as permitted by
8 law, and for such other and further relief as may be proper
9 under applicable provisions of law.

10 Dated at Los Angeles, California

11 this 15 day of April, 2013.

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14 
15 Robin Trujillo
16 Deputy Real Estate Commissioner
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22 cc: CELIA GALLARDO
23 C L P M Inc.
24 Robin Trujillo
25 Sacto.
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