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**FILED**

**MAY 16 2018**

**BUREAU OF REAL ESTATE**

By *John Smith*

8 BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of ) No. H-41038 LA  
12 LEONEL ACEVES, ) ACCUSATION  
13 Respondent. )  
14

15 The Complainant, Chika Sunquist, a Supervising Special  
16 Investigator of the State of California, for cause of accusation  
17 against LEONEL ACEVES, alleges as follows:

18 1. The Complainant, Chika Sunquist, a Supervising  
19 Special Investigator of the State of California, makes this  
20 Accusation in her official capacity.

21 2. LEONEL ACEVES (hereinafter referred to as  
22 "Respondent") presently has license rights under the Real Estate  
23 Law (Part 1 of Division 4 of the Business and Professions Code,  
24 hereinafter referred to as the "Code").

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1           3. On March 29, 2012, in Case No. H-36791 LA, an Order  
2 was issued revoking Respondent's broker license, with the right  
3 to a restricted broker license. The restricted license was  
4 issued on June 21, 2012. The license was restricted due to trust  
5 account shortages, commingling of trust funds with other funds,  
6 and failure to maintain accurate and complete trust account  
7 records.

8           4. On or about August 2, 2017, Respondent filed with  
9 the Bureau of Real Estate a Mortgage Loan Originator Endorsement  
10 Application.

11           5. Questions (K) (4), (5), (9), and (M) were answered  
12 No by Respondent. The proper answer would have been yes. The  
13 questions required disclosure of any order entered against  
14 Respondent in connection with a financial services-related  
15 activity, any revocation of Respondent's license, any order  
16 concerning any license, and any state or federal action taken  
17 against an organization controlled by Respondent.

18           6. The matters alleged in Paragraphs 4 and 5 are  
19 grounds to suspend or revoke Respondent's real estate license and  
20 license rights under Sections 10166.05, 10166.051(b), 10177(a),  
21 of the California Business and Professions Code and Section  
22 2945.2, Title 10, Chapter 6 of California Administrative Code.

23           Business and Professions Code Section 10106  
24 provides, in pertinent part, that in any order issued in  
25 resolution of a disciplinary proceeding before the Bureau, the  
26 Commissioner may request the administrative law judge to direct a  
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1 licensee found to have committed a violation of this part to pay  
2 a sum not to exceed the reasonable costs of the investigation and  
3 enforcement of the case.

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

13 Dated at Sacramento, California,

14 this 17<sup>th</sup> day of April, 2018.

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16   
17 CHIKA SUNQUIST  
18 Supervising Special Investigator

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24  
25 cc: Leonel Aveves  
26 Chika Sunquist  
27 Sacto.