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FILED

JUN 14 2019

DEPT. OF REAL ESTATE

By John Lopez

9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-41382 LA
13 JANE PARK GARCIA,) ACCUSATION
14 Respondent.)
15 _____)

16 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
17 of California, for cause of Accusation against JANE PARK GARCIA, also known as Jane P.
18 Matsuba, Jane Matsuba-Garcia, Jane Garcia, Jane Park, Lucy Vanalden, Gabby Charis, and
19 Gabby Chris (“Respondent”) alleges as follows:

20 1.

21 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
22 of California, makes this Accusation in her official capacity.

23 2.

24 Respondent presently has license rights under the Real Estate Law, Part 1 of
25 Division 4 of the California Business and Professions Code (“Code”), as a real estate

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ACCUSATION

1 salesperson (License ID 01298472). Respondent's license expired on July 13, 2017. The
2 Department of Real Estate retains jurisdiction over the lapsed license pursuant to Section 10103
3 of the Code.

4 FIRST CAUSE OF ACCUSATION

5 (CRIMINAL CONVICTIONS)

6 3.

7 On or about December 3, 2018, in the United States District Court, Central
8 District of California, Case No. CR 16-00538-RGK-3, Respondent was convicted on plea of
9 guilty for violation of 18 United States Code section 371 (conspiracy), violation of 18 United
10 States Code sections 1014, 2 (false statements in loan and credit application, aiding and
11 abetting and causing an act to be done), violation of 26 United States Code section 7206(1)
12 (subscribing to a false tax return). Respondent was ordered to the custody of the Bureau of
13 Prisons for fifty-seven (57) months. Upon release from imprisonment, Respondent is to be
14 placed on supervised release for three (3) years, on certain terms and conditions, including not
15 to be employed by or affiliated with the conduct of the affairs of any financial institution
16 insured by the Federal Deposit Insurance Corporation, not engage in any business involving
17 loan programs, real estate sales, real estate transfers, escrow, bankruptcy filings, or notary
18 service, without the express approval of the Probation Officer prior to engaging in such
19 employment, and not be employed in any position the requires licensing and/or certification by
20 any local, state, or federal agency without the prior written approval of the Probation Officer.
21 Respondent was also ordered to pay restitution of \$12,208,992.49 to victims, and was ordered
22 to pay a special assessment to the United States.

23 4.

24 The convictions, as described in Paragraph 3 above, bear a substantial
25 relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the
26 qualifications, functions or duties of a real estate licensee.

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ACCUSATION

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The crimes of which Respondent was convicted, as described in Paragraph 3 above, constitute cause under Sections 490 and 10177(b) of the Code for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

SECOND CAUSE OF ACCUSATION
(FAILURE TO REPORT CONVICTIONS)

6.

Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, "the conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any felony or misdemeanor" to the Department of Real Estate ("Department") within thirty (30) days of the conviction. Respondent failed to report in writing to the Department the convictions described in Paragraph 3 above, within thirty (30) days of the conviction date.

7.

Respondent's failure to timely report the convictions constitutes cause under Section 10186.2 of the Code for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

(COSTS OF INVESTIGATION AND ENFORCEMENT)

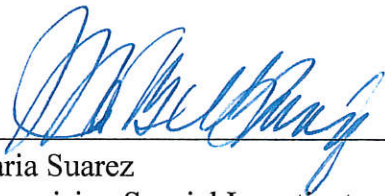
8.

California Business and Professions Code section 10106, provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Bureau of Real Estate, the Commissioner may request the administrative law judge to direct a licensee found to have committed a violation of this part to 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
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3 disciplinary action against all the licenses and license rights of Respondent JANE PARK
4 GARCIA under the Real Estate Law, for the costs of investigation and enforcement as
5 permitted by law, and for such other and further relief as may be proper under other applicable
6 provisions of law.

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8 Dated at Los Angeles, California this 13th day of June, 2019.

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12 _____
13 Maria Suarez
14 Supervising Special Investigator
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25 cc: JANE PARK GARCIA
26 Maria Suarez
27 Sacto.