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FILED

NOV 02 2011

DEPARTMENT OF REAL ESTATE
By: *L. Frost*

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)	
)	No. H-2689 FR
)	
12 GERARDO VALADEZ,)	<u>ACCUSATION</u>
)	
13 Respondent.)	
)	

16 The Complainant, LUKE MARTIN, acting in his official capacity as a Deputy
17 Real Estate Commissioner of the State of California, for cause of Accusation against
18 GERARDO VALADEZ (herein "Respondent"), is informed and alleges as follows:

19 1.

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

23 2.

24 On or about May 17, 2011, in the Superior Court of the State of California,
25 County of Monterey, Case No. SS102523A, Respondent was convicted of violating section
26 368(d) the Penal Code (Theft From Elder or Dependent Adult), a felony which bears a

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1 substantial relationship under section 2910, title 10, California Code of Regulations to the
2 qualifications, functions or duties of a real estate licensee.

3 3.

4 The facts alleged above in Paragraph 2 constitute grounds under sections 490 and
5 10177(b) of the Code for suspension or revocation of all licenses and license rights of
6 Respondent under Part 1 of Division 4 of the Code (herein "the Real Estate Law").

7 WHEREFORE, Complainant prays that a hearing be conducted on the
8 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
9 disciplinary action against all licenses and license rights of Respondent under the Real Estate
10 Law, and for such other and further relief as may be proper under the provisions of law.

11
12 

13 LUKE MARTIN

Deputy Real Estate Commissioner

14 Dated at Fresno, California,

15 this 25th day of OCTOBER, 2011.