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**FILED**

DEC 23 2015

BUREAU OF REAL ESTATE

By B. Nicholas

9 BEFORE THE BUREAU OF REAL ESTATE

10 STATE OF CALIFORNIA

11 \* \* \*

12 In the Matter of the Accusation of

13 MARIA VEGA,

14 Respondent.

No. H- 2978 FR

ACCUSATION

15 The Complainant, BRENDA SMITH, a Supervising Special Investigator of the  
16 State of California, for cause of Accusation against MARIA VEGA (Respondent), is informed  
17 and alleges as follows:

18 1

19 The Complainant, BRENDA SMITH, a Supervising Special Investigator of the  
20 State of California, makes this Accusation in her official capacity.

21 2

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

25 3

26 On or about December 1, 2014, in the United States District Court, Eastern  
27 District of California, Case No. 1:12CR00245-01, Respondent was convicted of violating Title

1 26 United States Code Section 7206(1) (making and subscribing a false tax return), a felony  
2 which bears a substantial relationship under Section 2910, Title 10, of the California Code of  
3 Regulations to the qualifications, functions or duties of a real estate licensee.

4 4

5 The facts alleged in Paragraph 3 constitute grounds under Sections 490  
6 and 10177(b) of the Code for suspension or revocation of all licenses and license rights of  
7 Respondent under Part 1 of Division 4 of the Code.

8 COST RECOVERY

9 5

10 Section 10106 of the Code provides, in pertinent part, that in any order issued in  
11 resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the  
12 Administrative Law Judge to direct a licensee found to have committed a violation of this part to  
13 pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

14 WHEREFORE, Complainant prays that a hearing be conducted on the allegations  
15 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary  
16 action against all licenses and license rights of Respondent under the Code, for the cost of  
17 investigation and enforcement as permitted by law, and for such other and further relief as may  
18 be proper under the provisions of law.

19   
20 BREND A SMITH  
21 Supervising Special Investigator

22 Dated at Sacramento, California,

23 this 21 day of December, 2015

24 DISCOVERY DEMAND

25 Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the Bureau of Real  
26 Estate hereby makes demand for discovery pursuant to the guidelines set forth in the  
27 *Administrative Procedure Act*. Failure to provide Discovery to the Bureau of Real Estate may  
result in the exclusion of witnesses and documents at the hearing or other sanctions that the  
Office of Administrative Hearings deems appropriate.