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DEPARTMENT OF REAL ESTATE

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BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of

MIA LA'SHA LANKFORD,

Respondent.

No. H-3445 FR

ACCUSATION

The Complainant, BRENDA SMITH, acting in her official capacity as a
Supervising Special Investigator of the State of California, for cause of Accusation against
MIA LA'SHA LANKFORD (Respondent), is informed and alleges as follows:

1

At all times herein mentioned, Respondent was and is presently licensed and/or
has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and
Professions Code (the Code) by the Department of Real Estate (the Department) as a real estate
salesperson.

2

On or about October 6, 2021, the Department of Consumer Affairs, Board of
Vocational Nursing and Psychiatric Technicians, State of California, in Case No.
4302019001089, after proceedings comparable to the Administrative Procedure Act in which
Respondent was given fair notice of the charges, an opportunity for a hearing, and other due

1 process protections comparable to the Administrative Procedure Act, Respondent's psychiatric
2 technician license was revoked, for acts which, if done by a real estate license, would be grounds
3 for the suspension or revocation of a California real estate license pursuant to the provisions of
4 Sections 10176 (a) (Substantial Misrepresentation), 10176 (i) (Fraud or Dishonest Dealings),
5 10177 (g) (Negligence or Incompetence), and 10177 (j) (Fraud or Dishonest Dealings) of the
6 Code.

7 3


8 The facts alleged above, in Paragraph 2, constitute grounds under Section 10177
9 (f) (Other License Discipline) of the Code for suspension or revocation of all licenses and
10 license rights of Respondent under the Real Estate Law.

11 COST RECOVERY

12 4

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

18 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
19 of this Accusation and that upon proof thereof, a decision be rendered revoking all licenses and
20 license rights of Respondent under the Real Estate Law, for the cost of investigation and
21 enforcement as permitted by law, and for such other and further relief as may be proper under
22 other provisions of law.

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24 
25 BREND A SMITH
26 Supervising Special Investigator

27 Dated at Fresno, California, on
this 10 day of August, 2022.

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