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FILED

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DEPARTMENT OF REAL ESTATE
By B. Nicholas

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of:)
12) No. H-3638 FR
13 JANET LOUISE RAMOS,)
14) ACCUSATION
Respondent.)
_____)

15 The Complainant, RUBEN CORONADO, acting in his official capacity as a
16 Supervising Special Investigator of the State of California, for this Accusation against JANET
17 LOUISE RAMOS ("RAMOS"), is informed and alleges as follows:

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19 RAMOS is presently licensed and/or has license rights under the Real Estate Law,
20 Part 1 of Division 4 of the Business and Professions Code ("Code"), by the Department of Real
21 Estate ("Department") as a real estate broker, License No. 01279514.

22 2

23 At all times mentioned, Respondent engaged in the business of, acted in the
24 capacity of, advertised, or assumed to act as a real estate broker within the State of California
25 within the meaning of Section 10131(b) of the Code, including the operation and conduct of a
26 property management business with the public wherein, on behalf of others, for compensation or
27 in expectation of compensation, Respondent leased or rented or offered to lease or rent, or placed

for rent, or solicited listings of places for rent, or solicited for prospective tenants, or negotiated the sale, purchase or exchange of leases on real property, or on a business opportunity, or collected rents from real property, or improvements thereon, or from business opportunities.

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Whenever acts referred to below are attributed to Respondent, those acts are alleged to have been done by Respondent, acting by themselves, or by and/or through one or more known or unknown agents, associates, and/or co-conspirators.

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On or about September 2, 2025, the Department completed its audit of the books and records of RAMOS' property management activities described above in Paragraph 2. The auditor examined the property management records for the period of June 1, 2023, through November 30, 2024 ("the audit period").

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While acting as a real estate broker as described in Paragraph 2, above, and within the audit period, RAMOS accepted or received funds in trust ("trust funds") from or on behalf of property owners, lessees and others in connection with property management activities, and deposited or caused to be deposited those funds into bank accounts maintained by RAMOS at United Security Bank, 40074 Highway 49, Oakhurst, CA 93644, as described below:

TRUST ACCOUNT #1 ("T/A1")	
Account No.:	XXX2375
Entitled:	Summit Real Estate Trustee Account H-M
TRUST ACCOUNT #2 ("T/A2")	
Account No.:	XXX2065
Entitled:	Summit Real Estate Trustee Account Apartments
TRUST ACCOUNT #3 ("T/A3")	

Account No.:	XXX2413
Entitled:	Summit Real Estate Trustee Account A-G

and thereafter from time-to-time made disbursements of said trust funds.

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In the course of the activities described in Paragraph 2, in connection with the collection and disbursement of trust funds, it was determined that:

- (a) An accountability was performed on account T/A1, and as of October 31, 2024, a shortage of \$21,511.98 out of a total accountability of \$134,920.26 was revealed in violation of Section 10145 (handling of trust funds) of the Code;
- (b) An accountability was performed on account T/A2, and as of October 31, 2024, a shortage of \$4,809.09 out of a total accountability of \$98,349.39 was revealed in violation of Section 10145 of the Code;
- (c) An accountability was performed on account T/A3, and as of October 31, 2024, a shortage of \$17,296.01 out of a total accountability of \$227,426.50 was revealed in violation of Section 10145 of the Code;
- (d) RAMOS did not have evidence that the owners of the trust funds in T/A1, T/A2, and T/A3 had given their written consent to allow RAMOS to reduce the balance of the funds in each account to an amount less than their corresponding existing aggregate trust fund liabilities in violation of Section 2832.1 (trust fund handling for multiple beneficiaries) of Title 10, Chapter 6, California Code of Regulations (“Regulations”);
- (e) During the audit period, RAMOS failed to perform and maintain an monthly reconciliation comparing the sum of the separate records to the balance of the record of all trust funds received and disbursed

(control record) for T/A1, T/A2, and T/A3 in violation of Section 10145 of the Code and Section 2831.2 (trust account reconciliation) of the Regulations;

(f) During the audit period, RAMOS regularly kept more than \$200 of her own funds in T/A3 in violation of Section 10176(e) (commingling) of the Code and Section 2835 (commingling) of the Regulations.

GROUND FOR DISCIPLINE

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The acts and/or omissions described above in Paragraphs 2 through 6 are grounds for discipline under Sections 10176(e), 10177(d) (willful disregard or violation of real estate laws), and/or 10177(g) (negligence or incompetence) of the Code.

COSTS OF INVESTIGATION AND ENFORCEMENT

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Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, 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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The acts and/or omissions of RAMOS as alleged above, entitle the Department to reimbursement of the costs of its audit pursuant to Section 10148(b) of the Code.

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all licenses and license rights of Respondent under the Real Estate

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1 Law, for the cost of investigation and enforcement as permitted by law, and for such other and
2 further relief as may be proper under other provisions of law.

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4 RUBEN CORONADO
5 Supervising Special Investigator

6 Dated at Fresno, California,
7 this 27th day of January, 2026.
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10 DISCOVERY DEMAND

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