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FILED

FEB - 1 2013

DEPARTMENT OF REAL ESTATE

By K. Contreras

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

In the Matter of the Accusation of)

PIETER KLOOS,)

Respondent.)

NO. H-5952 SAC

ACCUSATION

15 The Complainant, Tricia D. Sommers, a Deputy Real Estate Commissioner
16 of the State of California, for cause of Accusation against PIETER KLOOS (hereinafter
17 "Respondent"), is informed and alleges as follows:

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19 The Complainant makes this Accusation against Respondent in her official
20 capacity.

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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 (hereinafter "Code") as a real
24 estate salesperson.

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26 On or about July 24, 2012, in the Superior Court of California, County of Lassen,
27 Case No. CR-028248, Respondent was convicted of a violation of Section 476a(a) of the

1 California Penal Code (passing check with non-sufficient funds), a misdemeanor which bears a
2 substantial relationship under Section 2910(a)(1), Title 10, of the California Code of
3 Regulations (hereinafter "Regulations"), (the fraudulent taking, obtaining, appropriating or
4 retaining of funds or property belonging to another person), and Section 2910(a)(4) of the
5 Regulations (the employment of bribery, fraud, deceit, falsehood or misrepresentation to
6 achieve an end) to the qualifications, functions, or duties of a real estate licensee.

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8 On January 14, 2013, a diligent search was made of the records of the
9 Department of Real Estate (hereinafter "Department") relating to Respondent's Real Estate
10 Salesperson License No. 01835684. As a result of said search, no record was discovered having
11 been received from Respondent notifying the Department, in writing, of any conviction of
12 Respondent, including any verdict of guilt, or plea of guilt or no contest, of any felony or
13 misdemeanor.

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15 The facts alleged in Paragraph 4 indicate Respondent's failure to comply with
16 Sections 10186.2(a)(1)(B) and 10186.2(a)(2) (failure to report in writing to the Department
17 any conviction of a felony or misdemeanor within 30 days) of the Code, and constitute cause
18 under Section 10177(d) (willful disregard or violation of the Real Estate Law) of the Code for
19 revocation of all licenses and license rights of Respondent under said Real Estate Law.

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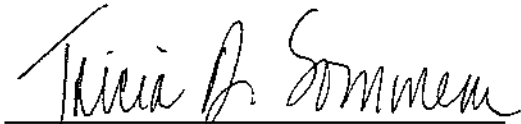
21 The facts alleged above constitute cause under Sections 490 (conviction
22 of substantially related crime) and/or 10177(b) (further grounds for disciplinary action –
23 conviction of crime) of the Code for suspension or revocation of all licenses and license rights
24 of Respondent under the Real Estate Law.

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26 Section 10106 of the Code provides, in pertinent part, that in any order issued in
27 resolution of a disciplinary proceeding before the Department, the Commissioner may request

1 the Administrative Law Judge to direct a licensee found to have committed a violation of this
2 part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the
3 case.

4 WHEREFORE, Complainant prays that a hearing be conducted on the
5 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
6 disciplinary action against all licenses and license rights of Respondent under the Real Estate
7 Law (Part 1 of Division 4 of the Business and Professions Code), and for such other and further
8 relief as may be proper under other provisions of law.

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12 TRICIA D. SOMMERS
13 Deputy Real Estate Commissioner
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16 Dated at Sacramento, California,
17 this 18th day of January, 2013.
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