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FILED

SEP 24 2015

BUREAU OF REAL ESTATE

By S. Black

BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)

LORRIE ANN CHAPMAN,)

Respondent.)

No. H-6308 SAC

ACCUSATION

15 The Complainant, TRICIA PARKHURST, a Supervising Special Investigator of
16 the State of California, for cause of Accusation against LORRIE ANN CHAPMAN
17 (Respondent), is informed and alleges as follows:

1

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

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 broker.

3

25 On or about December 24, 2014, in the Superior Court of the State of California,
26 County of Tehama, case number NCR-60884, Respondent was convicted of violating Section
27 10980(g)(2) of the California Welfare and Institutions Code (CalFresh or Supplemental Nutrition

1 Assistance Program Fraud), a misdemeanor which bears a substantial relationship under Section
2 2910, Title 10, of the California Code of Regulations to the qualifications, functions or duties of
3 a real estate licensee.

4 4

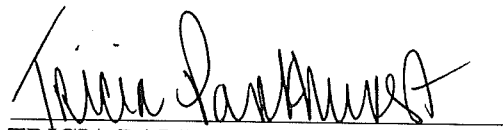
5 The facts alleged in Paragraph 3 constitute grounds under Sections 490
6 and 10177(b) of the Code for suspension or revocation of all licenses and license rights of
7 Respondent under Part 1 of Division 4 of the Code.

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 TRICIA PARKHURST
21 Supervising Special Investigator

22 Dated at Sacramento, California,
23 this 11th day of September, 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.