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FILED

NOV 18 2020

DEPARTMENT OF REAL ESTATE
By B. N. Cholas

9 **BEFORE THE DEPARTMENT OF REAL ESTATE**
10 **STATE OF CALIFORNIA**

11 * * *

12 In the Matter of the Accusation of)

13 SARA ANN MEDINA,)

14 Respondent.)

No. H- 7009 SAC

ACCUSATION

15 The Complainant, TRICIA D. PARKHURST, in her official capacity as a
16 Supervising Special Investigator of the Department of Real Estate ("Department") of the State of
17 California, brings this Accusation against Respondent SARA ANN MEDINA ("Respondent"),
18 and is informed and alleges as follows:

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

23 2

24 On or about January 14, 2020, in the Superior Court of the State of California,
25 County of Napa, Case No. 18CR003172, Respondent was convicted of violating Section
26 530.5(a) (identity theft) of the California Penal Code, a crime which bears a substantial
27 relationship under Section 2910, Title 10, of the California Code of Regulations (Regulations) to
the qualifications, functions or duties of a real estate licensee.

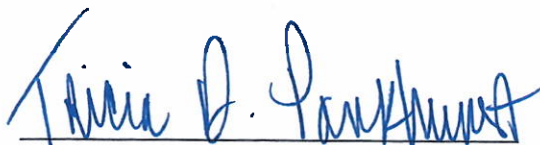
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The facts identified in paragraph 2, constitutes cause under Sections 490 and 10177(b) of the Code, for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

COST RECOVERY

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.

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


TRICIA D. PARKHURST
Supervising Special Investigator

Dated at Sacramento, California,
this 9th day of November, 2020

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DISCOVERY DEMAND

Pursuant to Sections 11507.6, *et seq.* of the *Government Code*, the Department of Real Estate hereby makes demand for discovery pursuant to the guidelines set forth in the *Administrative Procedure Act*. Failure to provide Discovery to the Department 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.