

1 RICHARD K. UNO, Counsel III (SBN 98275)
2 Department of Real Estate
3 P. O. Box 137007
4 Sacramento, CA 95813-7007
5 Telephone: (916) 576-8700
6 (916) 263-3767 (Fax)
7 Email: Richard.Uno@dre.ca.gov

FILED
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DEPARTMENT OF REAL ESTATE
By J. Taqqouf

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)

12 LAURA DODD,)

13 Respondent.)

No. H-7104 SAC

ACCUSATION

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

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

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

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On or about July 28, 2021, in the Superior Court of the State of California, County of Kern, Case No. MF 013672A, Respondent was convicted of violating Section 273.5 (corp. injury spouse/cohabitant) and Section 69 (obstruct/resist executive officer) of the California Penal Code, both misdemeanors which bear a substantial relationship under Section 2910, Title 10, California Code of Regulations, to the qualifications, functions, or duties of a real estate licensee.

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The facts alleged above constitute cause under Section 10177(b) (Further Grounds for Disciplinary Action- Conviction of Crime) and Section 490 (Conviction Substantially Related Crime) of the Code for suspension or revocation of Respondent's license under the Real Estate Law.

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A diligent search was made of the records of the Department of Real Estate (Department), relating to Respondent's real estate broker's license. As a result of said search, no record was discovered having been received from Respondent notifying the Department, in writing, of any conviction.

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The facts alleged above, in Paragraphs 3 and 5, constitute a violation of Section 10186.2 (failure to report in writing, a conviction within 30 days) of the Code, and are grounds for revocation of all licenses and license rights of Respondent under Section 10177(d) of the Code.

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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.

1 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
2 of this Accusation and that, upon proof thereof, a Decision be rendered imposing disciplinary
3 action against all licenses and license rights of Respondent under the Code, for the reasonable
4 costs of investigation and prosecution of this case, including agency attorney's fees, and for such
5 other and further relief as may be proper under provisions of law.

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8 TRICIA D. PARKHURST
9 Supervising Special Investigator

10 Dated at Sacramento, California
11 this 25th day of February 2022.

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13 DISCOVERY DEMAND

14 The Department of Real Estate hereby requests discovery pursuant to Section
15 11507.6 of the California Government Code. Failure to provide discovery to the Department
16 may result in the exclusion of witnesses and/or documents at the hearing, and other sanctions as
17 the Administrative Law Judge deems appropriate.