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FILED

DEC 14 2011

DEPARTMENT OF REAL ESTATE

By L. Amst

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

In the Matter of the Accusation of

KATIA BONILLA,

Respondent.

No. H-11265 SF

ACCUSATION

The Complainant, E.J. HABERER, II, acting in his official capacity as a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against KATIA BONILLA (herein "Respondent"), is informed and alleges as follows:

1.

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

2.

On or about February 23, 2011, in the United States District Court for the Northern District of California, Case No. CR-10-00811-001 EMC, Respondent was convicted of violating title 18, sections 1012 and 2 of the United States Code (False Statements to Department of Housing and Urban Development and Aiding and Abetting), a misdemeanor

1 which bears a substantial relationship under section 2910, title 10, California Code of
2 Regulations to the qualifications, functions or duties of a real estate licensee.

3 3.

4 The facts alleged above in Paragraph 2 constitute grounds under sections 490 and
5 10177(b) of the Code for suspension or revocation of all licenses and license rights of
6 Respondent under Part 1 of Division 4 of the Code (herein "the Real Estate Law").

7 WHEREFORE, Complainant prays that a hearing be conducted on the
8 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
9 disciplinary action against all licenses and license rights of Respondent under the Real Estate
10 Law, and for such other and further relief as may be proper under the provisions of law.

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13 E.J. HABERER, II
14 Deputy Real Estate Commissioner

15 Dated at Oakland, California,
16 this 5TH day of December, 2011.