

**FILED**

**July 2, 2012**

RICHARD K. UNO, Counsel (SBN 98275)  
Department of Real Estate  
P. O. Box 187007  
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DEPARTMENT OF REAL ESTATE

By 

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BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of	)	
	)	H-11418 SF
CRISTETA LEJANO LAGAREJOS,	)	
	)	<u>ACCUSATION</u>
Respondent.	)	
	)	

The Complainant, ROBIN S. TANNER a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against CRISTETA LEJANO LAGAREJOS, (Respondent), is informed and alleges as follows:

1

Complainant makes this Accusation against Respondent in her official capacity.

2

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 (Code) as a real estate broker.

3

On or about May 10, 2012, in the United States District Court, Northern District of California, Case No. 4:08 cr-00477-DLJ-4, Respondent was convicted of violating 18 USC 1349 (Conspiracy to Commit Bank Fraud) and 18 USC 1957/18 USC 2 (Monetary Transaction using Criminally Derived Property: Aiding and Abetting), both felonies and crimes which bear a

1 substantial relationship under Section 2910, Title 10, California Code of Regulations, to the  
2 qualifications, functions, or duties of a real estate licensee.

3 4

4 The facts alleged in Paragraph 3, above, constitute cause under Section 10177(b)  
5 (Further Grounds for Disciplinary Action-Conviction of Crime) and Section 490 (Conviction  
6 Substantially Related Crime) of the Code for suspension or revocation of Respondent's license  
7 under the Real Estate Law.

8 5

9 Section 10106 of the Code provides, in pertinent part, that in any order issued in  
10 resolution of a disciplinary proceeding before the department, the commissioner may request the  
11 administrative law judge to direct a licensee found to have committed a violation of this part to  
12 pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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

18  
19   
20 ROBIN TANNER  
21 Deputy Real Estate Commissioner

22 Dated at Oakland, California  
23 this 29<sup>th</sup> day of JUNE, 2012.