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**FILED**

DEC 26 2012

DEPARTMENT OF REAL ESTATE

By L. Frost

7  
8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of ) H-11492 SF  
12 )  
13 HUDSON ALVES REZENDE, ) ACCUSATION  
14 Respondent. )

15 The Complainant, ROBIN S. TANNER, acting in her official capacity as a  
16 Deputy Real Estate Commissioner of the State of California, for cause of Accusation against  
17 HUDSON ALVES REZENDE (herein "Respondent"), is informed and alleges as follows:

18 1.

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

22 2.

23 On or about June 6, 2011, in the United States District Court for the Northern  
24 District of California, Case No. CR-10-00692-001 CRB, Respondent was convicted of violating  
25 title 18, section 1349 of the United States Code (conspiracy to commit mail and wire fraud), a  
26 felony which bears a substantial relationship under section 2910, title 10, California Code of  
27 Regulations to the qualifications, functions or duties of a real estate licensee.

1 3.

2 The facts alleged above in Paragraph 2 constitute grounds under sections 490 and  
3 10177(b) of the Code for suspension or revocation of all licenses and license rights of  
4 Respondent under Part 1 of Division 4 of the Code (herein "the Real Estate Law").

5 4.

6 The Department will seek to recover costs of this suit pursuant to section 10106 of  
7 the Code which provides, in pertinent part, that in any order issued in resolution of a disciplinary  
8 proceeding before the Department, the commissioner may request the administrative law judge  
9 to direct a licensee found to have committed a violation of this part to pay a sum not to exceed  
10 the reasonable costs of the investigation and enforcement of the case.

11 WHEREFORE, Complainant prays that a hearing be conducted on the allegations  
12 of this Accusation and that upon proof thereof, a decision be rendered revoking all licenses and  
13 license rights of Respondent under the Real Estate Law, for the cost of investigation and  
14 enforcement as permitted by law, and for such other and further relief as may be proper under  
15 other provisions of law.

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17 \_\_\_\_\_  
18 ROBIN S. TANNER  
19 Deputy Real Estate Commissioner

20 Dated at Oakland, California,

21 this 18<sup>th</sup> day of September, 2012.

22 DISCOVERY DEMAND

23 Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the Department  
24 hereby makes demand for discovery pursuant to the guidelines set forth in the *Administrative*  
25 *Procedure Act*. Failure to provide Discovery to the Department may result in the exclusion of  
26 witnesses and documents at the hearing or other sanctions that the Office of Administrative  
27 Hearings deems appropriate.