

FILED

November 25, 2013

BUREAU OF REAL ESTATE

By R. Jones

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10 BEFORE THE BUREAU OF REAL ESTATE
11 STATE OF CALIFORNIA

12 * * *

13 In the Matter of the Accusation of

14 RAJENDRA NATH,

15 Respondent.

No. H-11615 SF

ACCUSATION

16 The Complainant, ROBIN S. TANNER, a Deputy Real Estate Commissioner of
17 the State of California, for cause of Accusation against RAJENDRA NATH (Respondent), is
18 informed and alleges as follows:

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20 The Complainant, ROBIN S. TANNER, a Deputy Real Estate Commissioner of
21 the State of California, makes this Accusation in her official capacity.

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

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2 On or about June 26, 2013, in the Superior Court of the State of California,
3 County of Alameda, Case No. 2340788, Respondent was convicted of violating Section 487(a)
4 the California Penal Code (grand theft), a felony and crime which bears a substantial relationship
5 under Section 2910, Title 10, of the California Code of Regulations (Regulations) to the
6 qualifications, functions or duties of a real estate licensee.

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8 The facts alleged above constitute grounds under Sections 490 and 10177(b) of
9 the Code for suspension or revocation of all licenses and license rights of Respondent under Part
10 1 of Division 4 of the Code.

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12 At no time prior to October 25, 2013, did Respondent provide notice of the above
13 conviction to the Bureau as required by Section 10186.2 of the Code.

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15 The facts alleged above constitute cause under Sections 10177(d) and 10186.2 of
16 the Code for suspension or revocation of Respondent's license under the Real Estate Law.

17 COST RECOVERY

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19 Section 10106 of the Code provides, in pertinent part, that in any order issued in
20 resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the
21 Administrative Law Judge to direct a licensee found to have committed a violation of this part to
22 pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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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 cost of
4 investigation and enforcement as permitted by law, and for such other and further relief as may
5 be proper under the provisions of law.
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9 ROBIN S. TANNER
Deputy Real Estate Commissioner

10 Dated at Oakland, California,
11 this 15th day of November, 2013
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13 DISCOVERY DEMAND

14 Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the Bureau of Real
15 Estate hereby makes demand for discovery pursuant to the guidelines set forth in the
16 *Administrative Procedure Act*. Failure to provide Discovery to the Bureau of Real Estate may
17 result in the exclusion of witnesses and documents at the hearing or other sanctions that the
18 Office of Administrative Hearings deems appropriate.
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