

FILED

JAN 21 2015

BUREAU OF REAL ESTATE

By S. Black

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9 BEFORE THE BUREAU OF REAL ESTATE

10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of)

No. H-11796 SF

13 DAOMING QIU,)

ACCUSATION

14 Respondent.)

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

18 1

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

21 2

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

24 3

25 On or about September 19, 2014, in the Superior Court of the State of California,
26 County of Santa Clara, Case No. B1155794, Respondent was convicted of violating Section
27 273.5(a) the California Penal Code (Inflicting Corporal Injury on a Spouse or Cohabitant), a

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

3 4

4 The facts alleged above constitute grounds under Sections 490 and 10177(b) of
5 the Code for suspension or revocation of all licenses and license rights of Respondent under Part
6 1 of Division 4 of the Code.

7 COST RECOVERY

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 Bureau, 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 cost of
16 investigation and enforcement as permitted by law, and for such other and further relief as may
17 be proper under the provisions of law.

18 
19 ROBIN S. TANNER
Deputy Real Estate Commissioner

20 Dated at Oakland, California,

21 this 16 day of January, 2015

22
23 DISCOVERY DEMAND

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