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On or about March 19, 2013, in the United States District Court, Northern District of California, Case No. CR-11-00947-001-WHA, Respondent was convicted, upon a plea of guilty, to violating Title 18, United States Code, Section 1349 (conspiracy to commit bank fraud and wire fraud), a felony and a crime which bears a substantial relationship to the qualifications, functions, or duties of a real estate licensee pursuant to Section 2910, Title 10, California Code of Regulations.

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Pursuant to Section 10186.2 of the Code, effective January 1, 2012, a licensee shall report in writing to the Bureau the bringing of an indictment or information charging a felony against the licensee, and the conviction of a licensee, including any verdict of guilty, or plea of guilty or no contest, of any felony or misdemeanor, within thirty (30) days of the date of the filing of the indictment or information, and conviction, verdict or plea. Respondent failed to report the felony charge and conviction identified in paragraph 2, above, in writing to the Bureau within the time required by Section 10186.2 of the Code. Such failures, individually and collectively, constitute grounds for the suspension or revocation of all licenses and license rights of Respondent pursuant to Section 10177(d) (willful disregard or violation of the Real Estate Law) of the Code, in conjunction with Section 10186.2 of the Code.

4

The facts identified in paragraph 2, above, constitutes cause under Sections 490 (Conviction of Crime), 10177(b) (Conviction of Crime Substantially Related to Qualifications, Functions or Duties of Real Estate Licensee), and 10176(i) (fraud or dishonesty in licensed capacity) and/or 10177(j) (fraud or dishonesty) of the Code for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

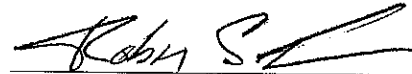
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1 Cost Recovery

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3 Section 10106 of the Code provides, in pertinent part, that in any order issued in
4 resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the
5 administrative law judge to direct a licensee found to have committed a violation of this part to
6 pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

7 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
8 of this Accusation and that upon proof thereof, a decision be rendered revoking all licenses and
9 license rights of Respondent under the Real Estate Law (Part 1 of Division 4 of the Business and
10 Professions Code), for the cost of investigation and enforcement as permitted by law, and for
11 such other and further relief as may be proper under other provisions of law.

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14 ROBIN S. TANNER
15 Supervising Special Investigator

16 Dated at Oakland, California,

17 this 13th day of November, 2015.