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**FILED**

APR 05 2019

DEPARTMENT OF REAL ESTATE

By R. Kropp

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of )

12 TEMITOPE SARAH SANUSI, )

13 Respondent. )

No. H-12369 SF

ACCUSATION

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15 The Complainant, ROBIN S. TANNER, acting in her official capacity as a  
16 Supervising Special Investigator of the State of California, for this Accusation against  
17 TEMITOPE SARAH SANUSI ("Respondent"), is informed and alleges as follows:

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

22 2

23 On or about December 18, 2018, in the Superior Court of the State of California,  
24 County of Santa Clara, Case No. C1886090, Respondent was convicted of violating Section  
25 23103(a) (reckless driving) of the California Vehicle Code, a misdemeanor and a crime that bears  
26 a substantial relationship to the qualifications, functions or duties of a real estate licensee  
27 pursuant to Section 2910, Title 10, of the California Code of Regulations ("Regulations").

On or about November 2, 2017, in the Superior Court of the State of California, County of Santa Clara, Case No. C1757129, Respondent was convicted of violating Section 273.5 (corporal injury to a spouse or cohabitant) of the California Penal Code, a misdemeanor and a crime that bears a substantial relationship to the qualifications, functions or duties of a real estate licensee pursuant to Section 2910 of the Regulations.

On March 13, 2019, a diligent search was made of the records of the Department of Real Estate ("Department") relating to Respondent's real estate salesperson license No. 01973080. No record or written notice was received from Respondent notifying the Department, in writing, of any arrest, conviction, indictment or license disciplinary action.

GROUND FOR DISCIPLINE

The facts alleged in Paragraphs 2 and 3, above, constitute cause under Sections 490 (conviction of substantially related crime) and 10177(b) (conviction of substantially related crime) of the Code for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

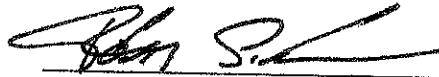
Respondent's failure to report the conviction to the Department, as described in Paragraph 4, above, violates Section 10186.2 (a) (conviction reporting requirements) of the Code, and constitutes cause under Section 10177(d) (willful disregard or violation of Real Estate Law) of the Code for suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

COST RECOVERY

The Department will seek to recover the costs of the investigation and prosecution of this case pursuant to Section 10106 of the Code which provides, in pertinent part, that in any

1 order issued in resolution of a disciplinary proceeding before the Department, the Commissioner  
2 may request the administrative law judge to direct a licensee found to have committed a violation  
3 of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement  
4 of the case.

5 WHEREFORE, Complainant prays that a hearing be conducted on the allegations  
6 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary  
7 action against all licenses and license rights of Respondent under the Real Estate Law, for the  
8 cost of investigation and enforcement as permitted by law, and for such other and further relief as  
9 may be proper under other provisions of law.

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12 ROBIN S. TANNER  
13 Supervising Special Investigator

14 Dated at Oakland, California,  
15 this 3<sup>rd</sup> day of April, 2019.

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17  
18 DISCOVERY DEMAND

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