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**FILED**

**JUN 04 2019**

**DEPARTMENT OF REAL ESTATE**

By B. Nicholas

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of )  
12 ) No. H-12383 SF  
13 LORRIE JEAN GLOVER, )  
14 Respondent. ) ACCUSATION

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 LORRIE  
17 JEAN GLOVER ("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.

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23 On or about November 9, 2016, in the Superior Court of the State of California,  
24 County of Mendocino, Case No. SCTM-CRCR-2016-87952-1, Respondent was convicted of  
25 violating Section 273a(a) (child endangerment) of the California Penal Code and Section  
26 23152(b) (driving under the influence-over .08%) of the California Vehicle Code, misdemeanors

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1 and crimes that bear a substantial relationship to the qualifications, functions or duties of a real  
2 estate licensee pursuant to Section 2910, Title 10, of the California Code of Regulations.

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4 On April 11, 2019, a diligent search was made of the records of the Department of  
5 Real Estate ("Department") relating to Respondent's real estate salesperson license No.  
6 02002237. No record or written notice was received from Respondent notifying the Department,  
7 in writing, of any arrest, conviction, indictment or license disciplinary action.

8 GROUND FOR DISCIPLINE

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

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15 Respondent's failure to report the conviction to the Department, as described in  
16 Paragraph 3, above, violates Section 10186.2 (a) (conviction reporting requirements) of the  
17 Code, and constitutes cause under Section 10177(d) (willful disregard or violation of Real Estate  
18 Law) of the Code for suspension or revocation of all licenses and license rights of Respondent  
19 under the Real Estate Law.

20 COST RECOVERY

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22 The Department will seek to recover the costs of the investigation and prosecution  
23 of this case pursuant to Section 10106 of the Code which provides, in pertinent part, that in any  
24 order issued in resolution of a disciplinary proceeding before the Department, the Commissioner  
25 may request the administrative law judge to direct a licensee found to have committed a violation  
26 of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement  
27 of the case.

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 Real Estate Law, for the  
4 cost of investigation and enforcement as permitted by law, and for such other and further relief as  
5 may be proper under other provisions of law.

6 

7 ROBIN S. TANNER  
8 Supervising Special Investigator

9 Dated at Oakland, California,

10 this 30<sup>th</sup> day of May, 2019.  
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13 DISCOVERY DEMAND

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