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FILED
JUL 28 2011
DEPARTMENT OF REAL ESTATE

By C. _____

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7
8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

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12 In the Matter of the Accusation of) NO. H-37409 LA
13)
14 TODD MICHAEL RICCIO,) A C C U S A T I O N
15)
16 Respondent.)
17)

16 The Complainant, Robin Trujillo, a Deputy Real Estate
17 Commissioner of the State of California, for cause of
18 Accusation against TODD MICHAEL RICCIO ("Respondent"), is
19 informed and alleges as follows:

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21 The Complainant, Robin Trujillo, a Deputy Real Estate
22 Commissioner of the State of California, makes this Accusation
23 in her official capacity.

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II

At all times herein mentioned, Respondent was licensed and/or has license rights under the Real Estate Law (Part 1 of Division 4 of the California Business and Professions Code, "Code") as a real estate salesperson. Respondent was first licensed as a real estate salesperson on March 9, 2010.

III

On or about July 29, 2010, in the Superior court of California, County of Ventura, Case No. 2010023363, Respondent was convicted of violating one misdemeanor count of Penal Code Section 484, subdivision (a) (petty theft). Said crime bears a substantial relationship to the qualifications, functions or duties of a real estate licensee under Section 2910, Title 10, Chapter 6, California Code of Regulations.

IV

The crime of which Respondent was convicted, as alleged in Paragraph III above, constitutes cause under Code Sections 490 and 10177(b) for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

IN AGGRAVATION

V

In aggravation, on or about September 30, 2009, in the Superior court of California, County of Ventura, Case No. 2009028213, Respondent was convicted of violating one

1 misdemeanor count of Vehicle Code Section 23152, subdivision
2 (b) (driving while having .08% or higher blood alcohol).

3 WHEREFORE, Complainant prays that a hearing be
4 conducted on the allegations of this Accusation and that upon
5 proof thereof, a decision be rendered imposing disciplinary
6 action against all licenses and/or license rights of
7 Respondent, TODD MICHAEL RICCIO, under the Real Estate Law
8 (Part 1 of Division 4 of the Business and Professions Code) and
9 for such other and further relief as may be proper under other
10 applicable provisions of law.

11 Dated at Los Angeles, California
12 this 15 day of July, 2011.

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15 ROBIN TRUJILLO
16 Deputy Real Estate Commissioner
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23 cc: Todd Michael Riccio
24 Robin Trujillo
25 Sacto.
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