

FILED

NOV 26 2013

BUREAU OF REAL ESTATE

By Norma L. Min

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DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of	)	No. H-39179 LA
	)	
RHONDA JOHAN GRAHAM,	)	<u>ACCUSATION</u>
	)	
Respondent.	)	
	)	

The Complainant, Maria Suarez, a Deputy Real Estate  
Commissioner of the State of California, for cause of accusation  
against RHONDA JOHAN GRAHAM, alleges as follows:

I

The Complainant, Maria Suarez, a Deputy Real Estate  
Commissioner of the State of California, makes this Accusation in  
her official capacity.

II

RHONDA JOHAN GRAHAM (hereinafter referred to as  
"Respondent") is presently licensed and/or has license rights  
under the Real Estate Law (Part 1 of Division 4 of the Business  
and Professions Code, hereinafter referred to as the "Code").

1 III

2 Respondent was licensed by the Department of Real  
3 Estate of the State of California as a real estate salesperson  
4 effective August 1, 2005.

5 IV

- 6 a. In aggravation, on or about June 18, 2007, in the  
7 County of San Bernardino, Superior Court of  
8 California, Respondent was convicted of violating  
9 Vehicle Code Section 23152(a) (driving under the  
10 influence).
- 11 b. In aggravation, on or about March 24, 2009, in the  
12 County of San Bernardino, Superior Court of  
13 California, Respondent was convicted of violating  
14 Vehicle Code section 23152(a) (driving under the  
15 influence).
- 16 c. On or about May 3, 2011, in the County of San Luis  
17 Obispo, Superior Court of California, Respondent  
18 was convicted of violating Vehicle Code section  
19 23152(b) (excessive alcohol in blood).
- 20 d. On or about November 28, 2011, in the County of  
21 San Bernardino, Superior Court of California,  
22 Respondent was convicted of violating Vehicle Code  
23 section 23152(b) (excessive alcohol in blood), a  
24 felony.

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V

The above referenced matters bear a substantial relationship to the qualifications, functions, or duties of a real estate licensee, Title 10, Chapter 6, Section 2910, California Administrative Code.

VI

Respondent's convictions alleged in Paragraph IV are cause under Code Sections 490 and 10177(b) for suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

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

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1 WHEREFORE, Complainant prays that a hearing be  
2 conducted on the allegations of this Accusation and that upon  
3 proof thereof, a decision be rendered imposing disciplinary  
4 action against all licenses and license rights of Respondent  
5 RHONDA JOHAN GRAHAM, under the Real Estate Law (Part 1 of  
6 Division 4 of the Business and Professions Code) for the cost of  
7 investigation and enforcement as permitted by law and for such  
8 other and further relief as may be proper under other applicable  
9 provisions of law.  
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11 Dated at Los Angeles, California,

12 this 24<sup>th</sup> day of October, 2013.

13   
14 MARIA SUAREZ  
15 Deputy Real Estate Commissioner  
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25 cc: Rhonda Johan Graham  
26 Maria Suarez  
27 Sacto.