1	AMELIA V. VETRONE, Counsel (SBN 134612)
2	Bureau of Real Estate 320 West 4th Street, Suite 350
3	Los Angeles, California 90013-1105 JAN 2 4 2014
4	Telephone: (213) 576-6982 DEPARTMENT OF REAL ESTATE (Direct) (212) 576 6040 BY:
5	(Direct) (213) 576-6940
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8	BEFORE THE BUREAU OF REAL ESTATE
9	STATE OF CALIFORNIA
10	* * *
11	In the Matter of the Accusation of ) No. H- 39282 LA
12	VENUS ELIZABETH SIERRA, ) $\underline{A \ C \ U \ S \ A \ T \ I \ O \ N}$
13	Respondent.
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15	The Complainant, Robin Trujillo, a Deputy Real Estate Commissioner of the
16	State of California, acting in her official capacity, for cause of Accusation against VENUS
17	ELIZABETH SIERRA ("Respondent") alleges as follows:
18	1.
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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1	(CRIMINAL CONVICTION)
2	2.
3	On or about April 15, 2011, in the Superior Court of California, County of
4	Orange, in Case No. 11NM04948, Respondent was convicted of violating Penal Code Section
5	602(k) (Trespass), a misdemeanor. This crime is substantially related to the qualifications,
6	functions or duties of a real estate licensee under Section 2910, Title 10, Chapter 6, California
7	Code of Regulations.
8	3.
9	The crime of which Respondent was convicted, as described above, constitutes
10	cause under Sections 490 and 10177(b) of the Business & Professions Code for the suspension
11	or revocation of the license and license rights of Respondent under the Real Estate Law.
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13	California Business and Professions Code Section 10106 provides, in pertinent
14	part, that in any order issued in resolution of a disciplinary proceeding before the Bureau, the
15	Commissioner may request the administrative law judge to direct a licensee found to have
16	committed a violation of this part to pay a sum not to exceed the reasonable costs of
17	investigation and enforcement of the case.
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WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all the licenses and license rights of Respondent VENUS ELIZABETH SIERRA under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code), for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law. Jan. 6. Dated at Los Angeles, California:\_ rujilo Robin Truillo Deputy Real Estate Commissioner Venus Elizabeth Sierra cc: Robin Trujillo Sacto.