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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-39921 LA
12	)
13	MARIBEL FRIAS, ) <u>ACCUSATION</u>
ŀ	Respondent.
14	)
L5	
16	The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
L7	State of California, for cause of Accusation against MARIBEL FRIAS, a.k.a. Maribel Nava
18	Frias, ("Respondent"), alleges as follows:
19	1.
20	The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
21	State of California, makes this Accusation in her official capacity.
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23	2.
	Respondent presently has license rights under the Real Estate Law, Part 1 of
24	Division 4 of the California Business and Professions Code ("Code"), as a real estate
25	salesperson.
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#### FIRST CAUSE OF ACTION

### (CRIMINAL CONVICTIONS)

3.

On or about April 8, 2013, in the Superior Court of California, County of Orange, Case No. 12CF2636, Respondent pled guilty to and was convicted for violation of California Insurance Code Section 1871.4(a)(1) (insurance fraud) and California Penal Code Section 550(b)(3) (insurance fraud), both misdemeanors. These convictions bear a substantial relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real estate licensee.

4.

The crimes of which Respondent was convicted, as described in Paragraph 3 above, constitute cause under Sections 490, 10177(b), and 10177(j) of the Code for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

## SECOND CAUSE OF ACTION

# (FAILURE TO REPORT CONVICTIONS)

Pursuant to Code Section 10186.2, a licensee shall report, in writing, "the conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any felony or misdemeanor" to the Bureau within 30 days of the conviction. Respondent failed to report in writing to the Bureau the convictions described in Paragraph 3 above, within thirty (30) days of the conviction date.

6.

Respondent's failure to timely report the convictions constitutes cause under Section 10186.2 of the Code for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

#### Accusation of Maribel Frias

cc:

California Business and Professions Code Section 10106, provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Bureau of Real Estate, 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.

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 MARIBEL FRIAS under the Real Estate Law 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.

Dated at San Diego, California

this 15 day of July , 2015

Veronica Kilpatrick

Supervising Special Investigator

MARIBEL FRIAS Veronica Kilpatrick

Sacto.