

1 Julie L. To, Counsel (SBN 219482)
2 Bureau of Real Estate
3 320 West 4th Street, Suite 350
4 Los Angeles, California 90013
5 Telephone: (213) 576-6982
6 (Direct) (213) 576-6916

FILED

JUL 19 2016

BUREAU OF REAL ESTATE

By *[Signature]*

7 BEFORE THE BUREAU OF REAL ESTATE
8 STATE OF CALIFORNIA

9 * * *

10 In the Matter of the Accusation of) No. H-40315 LA
11)
12 CORRIE H. SOMMERS,) ACCUSATION
13)
14 Respondent.)
15)

16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
17 State of California, for cause of Accusation against CORRIE H. SOMMERS, a.k.a. Corrie
18 Heather Sommers ("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.

22 2.

23 Respondent is presently licensed and/or has license rights under the Real Estate
24 Law, Part 1 of Division 4 of the California Business and Professions Code as a real estate
25 salesperson, license number 01423994.

26 ///

27 ///

____CalBRE Accusation – Corrie H. Sommers

1 CAUSE FOR DISCIPLINE

2 (CRIMINAL CONVICTION)

3 3.

4 On or about September 23, 2013, in the Iowa District Court in Polk County Case
5 Number FECR257554, Respondent pled guilty to violation of Iowa Code Section 703.3
6 (accessory after the fact), a misdemeanor. On or about September 24, 2013, Respondent was
7 sentenced to two years in prison (suspended) and two years supervised probation. In addition,
8 Respondent was ordered to pay restitution in the amount of \$3,000

9 4.

10 The crime of which Respondent was convicted, by its facts and circumstances,
11 bears a substantial relationship under Section 2910, Title 10, Chapter 6, California Code of
12 Regulations to the qualifications, functions or duties of a real estate licensee.

13 5.

14 The crime of which Respondent was convicted constitutes cause under
15 California Business and Professions Code Sections 490 and 10177(b) for the suspension or
16 revocation of the license and license rights of Respondent under the Real Estate Law.

17 COSTS

18 6.

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

24 ///

25 ///

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

7 Dated at Los Angeles, California

8 this 12th day of July, 2016.

9
10
11
12
13 
14 Veronica Kilpatrick
15 Supervising Special Investigator
16
17
18

19 cc: Corrie H. Sommers
20 Prakashkumar Chhotubhai Bhakta
21 Veronica Kilpatrick
22 Sacto.
23
24
25
26
27