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FILED

SEP 14 2015

BUREAU OF REAL ESTATE

By *Adelino*

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7
8 BEFORE THE BUREAU OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of) No. H- 40381 LA
12)
12 INBAL GINDEL BEN DOV,) ACCUSATION
13)
13 Respondent.)
14)

15 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
16 State of California for cause of Accusation against INBAL GINDEL BEN DOV aka Inbal Ben
17 Dov aka Inbal Bendov aka Inbal Gindel-Michael ("Respondent") alleges as follows:

18 1.

19 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
20 State of California, makes this Accusation in her official capacity.

21 2.

22 Respondent is presently licensed and/or has license rights under the Real Estate
23 Law, Part 1 of Division 4 of the California Business and Professions Code as a real estate
24 salesperson (license no. 01917250).

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1 (CRIMINAL CONVICTIONS)

2 3.

3 On or about February 17, 2015, in the Superior Court of California, County of
4 Ventura, case no. 2013037531 F A, Respondent was convicted of violating California Penal
5 Code section 32 (accessory after the fact, to wit: money laundering), a felony, and California
6 Penal Code section 7028(a) (contracting without a license), a misdemeanor. In part,
7 Respondent was sentenced to 36 months formal probation, 180 days in jail, pay various fines
8 and fees, and not associate with Avi Gozlan or other individual associated with this complaint
9 except Yaniv Bendov. These crimes are substantially related to the qualifications, functions, or
10 duties of a real estate licensee under Section 2910, Title 10, Chapter 6, California Code of
11 Regulations.

12 4.

13 The crimes of which Respondent was convicted, as described above, constitute
14 cause under California Business and Professions Code sections 490 and 10177(b) for the
15 suspension or revocation of the license and license rights of Respondent under the Real Estate
16 Law.

17 (PRIOR LICENSE DISCIPLINE: DEPARTMENT OF INSURANCE)

18 5.

19 On or about July 23, 2014, the California Department of Insurance, in case no.
20 LCB 1563-AP (AR), issued an Order of Summary Revocation thereby revoking Respondent's
21 accident and health agent and life-only agent license, effective 30 days after this Order. As
22 more fully set forth in this Order of Summary Revocation, cause for revocation was based on
23 Respondent pleading guilty on or about December 13, 2013, in the Superior Court of
24 California, County of Ventura, case no. 2013037531 F A, to violating California Penal Code
25 section 32 (accessory after the fact, to wit: money laundering), a felony, and California Penal
26 Code section 7028(a) (contracting without a license), a misdemeanor.
27

1 6.

2 The prior license action against Respondent as alleged in Paragraph 5, above,
3 constitutes cause for discipline of Respondent's real estate license under California Business
4 and Professions Code section 10177(f).

5
6 (PRIOR LICENSE DISCIPLINE: CONTRACTORS STATE LICENSE BOARD)

7 7.

8 On or about December 17, 2014, the Registrar of Contractors, California
9 Contractors State License Board, in case no. N2012-522, issued an Order to Adopt Stipulated
10 Settlement thereby revoking the general building contractor's license of C & C Builders with
11 Respondent as its sole owner, effective January 20, 2015. As more fully set forth in the
12 Stipulated Revocation of License and Disciplinary Order and Accusation, on or about June 3,
13 2010, Respondent submitted an application for a general building contractor's license –
14 classification B to the California Contractors State License Board. In that application,
15 Respondent knowingly and fraudulently stated she had seven (7) years and three (3) months of
16 construction experience when in fact she had no hands-on construction experience, in violation
17 of California Business and Professions Code sections 498 and 7112. On or about June 10,
18 2011, a general building contractor's license was issued to C & C Builders in reliance on
19 Respondent's false statements.

20 8.

21 The prior license action against Respondent as alleged in Paragraph 7, above,
22 constitutes cause for discipline of Respondent's real estate license under California Business
23 and Professions Code sections 10177(f), 10177(g), and/or 10177(j).

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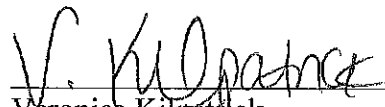
(COSTS)

9.

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, 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 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 licenses and/or license rights under the Real Estate Law (Part 1 of Division 4 of the California Business and Professions Code) of Respondent INBAL GINDEL BEN DOV for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under applicable provisions of law.

Dated at San Diego, California: September 7, 2016.



Veronica Kilpatrick
Supervising Special Investigator

cc: INBAL GINDEL BEN DOV
Salvador Escalante, Jr.
Veronica Kilpatrick
Sacto.