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FILED
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DEPT. OF REAL ESTATE
By 

9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-41774 LA
13 MAYBELENE ARROYO,) ACCUSATION
14 Respondent.)
15 _____)

16 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
17 of California, for cause of Accusation against MAYBELENE ARROYO, aka "Maria
18 Maybelene Arroyo" and "Marie Maybelene Arroyo" ("Respondent") alleges as follows:

19 1.

20 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
21 of California, makes this Accusation in her official capacity.

22 2.

23 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 (License ID 01083775). Respondent's license is set to expire on July 17, 2024,
26 unless renewed.

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ACCUSATION

1 (CRIMINAL CONVICTION)

2 3.

3 On or about April 12, 2018, in the United States District Court, Northern District
4 of California, Case No. 17-CR-00332-WHO, Respondent was convicted on a plea of guilty, for
5 violation of Title 26, United States Code, Section 7206(1) (filing a false tax return), a felony.
6 The court placed Respondent on formal probation for 3 years, under certain terms and
7 conditions, including in part, payment of fines and fees and payment of restitution to the
8 Internal Revenue Service in the amount of \$146,070.00.

9 4.

10 The conviction, as described in Paragraph 3 above, bears a substantial
11 relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the
12 qualifications, functions or duties of a real estate licensee.

13 5.

14 The crime for which Respondent was convicted, as described in Paragraph 3
15 above, constitutes cause under Code sections 490 and 10177(b) for the suspension or revocation
16 of the license and license rights of Respondent under the Real Estate Law.

17 (FAILURE TO REPORT CONVICTION)

18 6.

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

24 7.

25 Respondent's failure to timely report the conviction described in Paragraph 3 above,
26 within 30 days of the conviction, constitutes cause under Section 10186.2 of the Code for the
27

ACCUSATION

1 suspension or revocation of the license and license rights of Respondent under the Real Estate
2 Law.

3 (COSTS OF INVESTIGATION AND ENFORCEMENT)

4 8.

5 California Business and Professions Code section 10106, provides, in pertinent
6 part, that in any order issued in resolution of a disciplinary proceeding before the Department of
7 Real Estate, the Commissioner may request the administrative law judge to direct a licensee
8 found to have committed a violation of this part to pay a sum not to exceed the reasonable costs
9 of the investigation and enforcement of the case.

10 WHEREFORE, Complainant prays that a hearing be conducted on the
11 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
12 disciplinary action against all the licenses and license rights of MAYBELENE ARROYO under
13 the Real Estate Law, for the costs of investigation and enforcement as permitted by law, and for
14 such other and further relief as may be proper under other applicable provisions of law.

15
16 Dated at Los Angeles, California

17 this 17th day of September, 2020.

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20 
21 Maria Suarez
22 Supervising Special Investigator

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24
25
26 cc: MAYBENE ARROYO
27 Maria Suarez
Sacto.

ACCUSATION