1 2 3 4 5	Kevin H. Sun, Counsel (SBN 276539) Department of Real Estate 320 West 4th Street, Suite 350 Los Angeles, California 90013-1105 Telephone: (213) 576-6982 Fax: (213) 576-6917 Email: Kevin.Sun@dre.ca.gov Attorney for Complainant FILED JUN 0 1 2021 DEPT. OF REAL ESTATE By The Complainant Sun Proceedings of the Complainant Sun Pr
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8	BEFORE THE DEPARTMENT OF REAL ESTATE
9	STATE OF CALIFORNIA
10	***
11	In the Matter of the Accusation of) No. H-42023 LA
12	NAKIA ALEXANDRIA RENEAU-HOLLAND,) <u>ACCUSATION</u>
13)
14	Respondent.)
15	
16	The Complainant, Maria Suarez, a Supervising Special Investigator of the State
17	of California, for cause of Accusation against NAKIA ALEXANDRIA RENEAU-HOLLAND
18	("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.
:3	All references to the "Code" are to the California Business and Professions Code
4	and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.
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LICENSE HISTORY

3.

a. Respondent has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code, as a real estate salesperson ("RES"),

Department of Real Estate¹ ("Department") license ID 02081447.

b. The Department originally issued Respondent's RES license on or about December 14, 2018.

c. Respondent's RES license is scheduled to expire on December 13, 2022, unless renewed.

CAUSE FOR DISCIPLINE

(CRIMINAL CONVICTION)

4.

February 5, 2019; Penal Code ("PC") Sections 664/487(a) - Felony

a. On or about October 17, 2018, in the Superior Court of California, Los Angeles County, in Case No. **BA472226**, The People of the State of California v. Nakia Reneau-Holland and Jeffrey Holland, a felony complaint was brought against Respondent for violation of (1) PC Section 664/487(a) (attempted grand theft), a felony, and (2) PC Section 550(a)(1) (insurance fraud), a felony, (3) PC Section 550(a)(2) (insurance fraud), a felony, and (4) PC Section 148.5(a) (false report of a criminal offense), a misdemeanor.

b: On or about February 5, 2019, Respondent pled no contest to and was convicted of violation of (PC Section 664/487(a) (attempted grand theft), a felony.

c. On or about February 6, 2019, the Court dismissed the remaining counts and suspended the imposition of sentence and placed Respondent on summary probation for 2 years under certain terms and conditions, including, in part, payment of fines and fees.

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Between July 1, 2013 and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate under the Department of Consumer Affairs.

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The crime of which Respondent was convicted, as set forth in Paragraph 4 above, by its facts and circumstances, bears 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 and constitute cause under **Code Sections 490 and 10177(b)** for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

SECOND CAUSE FOR DISCIPLINE

(FAILURE TO REPORT)

6.

Respondent did not report in writing to the Department of a felony complaint (Case No. BA472226) being brought against her within thirty (30) days (October 17, 2018).

7.

Respondent's failure to report a felony complaint being filed against her constitutes cause for discipline under Code Section 10186.2² of the license and license rights of Respondent under the Real Estate Law.

COSTS

8.

Code Section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, 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.

² Pursuant to Business and Professions Code 10186.2: (a)(1) A licensee shall report any of the following to the department: (A) The bringing of an indictment or information charging a felony against the licensee. (B) The conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any felony or misdemeanor. (c) Any disciplinary action taken by another licensing entity or authority of this state or of another state or an agency of the federal government. (2)The report required by this subdivision shall be made in writing within 30 days of the date of the bringing of the indictment or the charging of a felony, the conviction, or the disciplinary action. (b) Failure to make a report required by this section shall constitute a cause for discipline.

PRAYER 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 NAKIA ALEXANDRIA RENEAU-HOLLAND, 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 Los Angeles, California this 18th day of Supervising Special Investigator NAKIA ALEXANDRIA RENEAU-HOLLAND Maria Suarez Sacto.

ACCUSATION