

**FILED**

APR 26 2022

DEPT. OF REAL ESTATE  
By 

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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-42280 LA  
12 )  
13 CARL HENRY TURVE, ) ACCUSATION  
14 )  
15 Respondent. )

16 The Complainant, Maria Suarez, a Supervising Special Investigator of the State  
17 of California, for cause of Accusation against CARL HENRY TURVE (“Respondent”), alleges  
18 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 broker  
25 (License ID 01374938). Respondent’s license is set to expire on December 30, 2022, unless  
26 renewed.

27 ///

ACCUSATION

1 (CRIMINAL CONVICTION)

2 3.

3 On or about September 22, 2021, in the Superior Court of California, County of  
4 Orange, Case No. 20NF2297, Respondent was convicted, on a plea of guilty, for violating  
5 Penal Code section 490.4(a)(1)/(b)(1) (organized retail theft – two or more thefts over \$950), a  
6 misdemeanor. The court suspended the imposition of sentence, and placed Respondent on  
7 informal probation for one (1) year, under certain terms and conditions, including in part, 60  
8 hours of community service, stay 100 yards away from Home Depot in Anaheim on Pullman,  
9 and payment of restitution, fines and fees.

10 4.

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

14 5.

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

18 (FAILURE TO REPORT CONVICTION)

19 6.

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

25 7.

26 Respondent’s failure to timely report the conviction described in Paragraph 3  
27 above constitutes cause under Section 10186.2 of the Code, and thereby violates Section

ACCUSATION

1 10177(d) of the Code, for the suspension or revocation of the license and license rights of  
2 Respondent under the Real Estate 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 9.

11 These proceedings are brought under the provisions of Section 10100, Division  
12 4 of the Business and Professions Code of the State of California and Sections 11500 through  
13 11528 of the California Government Code.

14 WHEREFORE, Complainant prays that a hearing be conducted on the  
15 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing  
16 disciplinary action against all the licenses and license rights of CARL HENRY TURVE under  
17 the Real Estate Law, for the costs of investigation and enforcement as permitted by law, and for  
18 such other and further relief as may be proper under other applicable provisions of law.

19  
20 Dated at Los Angeles, California  
21 this 26th day of April, 2022.

22  
23 *Maria Suarez*

24 \_\_\_\_\_  
25 Maria Suarez  
26 Supervising Special Investigator

27 cc: CARL HENRY TURVE  
Maria Suarez  
Sacto.

ACCUSATION