

FILED

JUN 09 2022

DEPT. OF REAL ESTATE

By *[Signature]*

LISSETE GARCIA, Counsel (SBN 211552)
Department of Real Estate
320 West 4th Street, Suite 350
Los Angeles, California 90013-1105
Telephone: (213) 576-6982
Direct: (213) 576-6914
Fax: (213) 576-6917
Attorney for Department of Real Estate

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation against

NATASHA SIMONE WHITE,

Respondent.

DRE No. H-42322 LA

ACCUSATION

The Complainant, Maria Suarez, a Supervising Special Investigator for the Department of Real Estate¹ ("Department") of the State of California, for cause of Accusation against NATASHA SIMONE WHITE ("Respondent") aka Natasha White, is informed and alleges as follows:

1. The Complainant, Maria Suarez, a Supervising Special Investigator for the Department, makes this Accusation in her official capacity.

2. All references to the "Code" are to the California Business and Professions Code, all references to the "Real Estate Law" are to Part 1 of Division 4 of the Code, and all

¹ 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.

1 references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

2 3. Respondent is presently licensed and/or has license rights under the Real Estate
3 Law (Part 1 of Division 4 of the Code).

4 4. From April 17, 2009, through the present, Respondent has been licensed by the
5 Department as a real estate broker, License ID 01851743. Unless renewed, Respondent's
6 license is scheduled to expire on April 16, 2025. Respondent has renewal rights pursuant to
7 Code section 10201. The Department retains jurisdiction pursuant to Code section 10103.

8 5. Respondent is licensed to do business as "Premium Platinum Realty."

9 First Cause of Accusation

10 Felony Conviction

11 6. On or about October 24, 2019, before the United States District Court, Northern
12 District of Georgia, Atlanta Division, in Case No. 1:18-CR-342-01-MHC, Respondent pled
13 guilty to and was convicted of violating one count of Title 18, United States Code section
14 1512(c)(2) (obstruction of an official proceeding), a felony. A Final Order and Judgment of
15 Forfeiture was entered against Respondent which included a forfeiture monetary judgment of
16 \$997,196.00 and seizure of funds held in two bank accounts in the amounts of \$54,326.93 and
17 \$4,923.47.

18 7. The conviction alleged above in Paragraph 6, and the underlying circumstances
19 surrounding said conviction, bear a substantial relationship to the qualifications, functions or
20 duties of a real estate licensee under Regulations 2910 and 2910.5.

21 8. Respondent's 2019 conviction constitutes cause for the suspension or revocation
22 of all licenses and license rights of Respondent pursuant to Code sections 490 and 10177,
23 subdivision (b).

24 ///

1

2

3

6

6

8

1 alleged above in Paragraph 6.

2 13. On November 18, 2019, the Supreme Court for the State of Georgia agreed to
3 accept Respondent's petition for voluntary surrender of her law license, which is tantamount to
4 disbarment.

5 14. Respondent's conviction, as described above in Paragraph 6, is grounds for the
6 suspension or revocation of a real estate license pursuant to Code section 10177, subdivision (b),
7 and 490.

8 15. The surrender of Respondent's license to practice law in the State of Georgia
9 constitutes cause for the suspension or revocation of Respondent's real estate license and license
10 rights pursuant to Code section 10177, subdivision (f).

11 Third Cause of Accusation – Code section 10186.2

12 16. There is hereby incorporated in this Third, separate and distinct Cause of
13 Accusation, all of the allegations contained in Paragraphs 1 through 15, above, with the same
14 force and effect as if herein fully set forth.

15 17. Code section 10186.2, subdivision (a)(1)(B), requires that licensees report the
16 bringing of a felony criminal complaint and felony or misdemeanor convictions. Code section
17 10186.2, subdivision (a)(1)(C), requires that licensees report any disciplinary action taken by
18 another licensing entity or authority of this state or another state or an agency of the federal
19 government. Code section 10186.2, subdivision (a)(2), requires that licensees make a report in
20 writing to the Department within 30 days of the bringing of the indictment, the charging of a
21 felony, a conviction, or a disciplinary action. Failure to make a report constitutes cause for
22 discipline under Code section 10186.2, subdivision (b).

23 18. A diligent search was made of the Department's records for Respondent and no
24 record or written notice was found to have been received from Respondent notifying the

1 Department of the felony conviction or the surrender of Respondent's license to practice law, as
2 described above in Paragraphs 6 through 13, within 30 days of said actions.

3 19. Respondent's failure to provide timely written notice to the Department pursuant
4 to Code section 10186.2 constitutes cause for the suspension or revocation of Respondent's real
5 estate license and license rights under Code section 10186.2, subdivision (b), and section 10177,
6 subdivisions (d) and/or (g).

7 COST RECOVERY

8 20. Code Section 10106 provides, in pertinent part, that in any order issued in
9 resolution of a disciplinary proceeding before the Department, the Commissioner may request
10 the Administrative Law Judge to direct a licensee found to have committed a violation of this
11 part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the
12 case.

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

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

Dated June 8, 2022 at Los Angeles, California.

Maria Suarez
MARIA SUAREZ
Supervising Special Investigator

cc: Natasha Simone White
Maria Suarez
Sacto.