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FILED

FEB 29 2024

DEPT. OF REAL ESTATE

By: [REDACTED]

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of) No. H-42826 LA
)
JENNIFER KAY NATERS,) A C C U S A T I O N
)
Respondent.)

The Complainant, Ray Dagnino, a Supervising Special Investigator of the State of California, for cause of Accusation against JENNIFER KAY NATERS ("Respondent"), is informed and alleges as follows:

1.

The Complainant, Ray Dagnino, acting in his official capacity as a Supervising Special Investigator of the State of California, makes this Accusation against JENNIFER KAY NATERS.

2.

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

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Accusation of JENNIFER KAY NATERS

1 FIRST CAUSE OF ACTION
2 (CRIMINAL CONVICTION)

3 3.

4 On or about March 27, 2023, Respondent pled nolo contendere and was
5 convicted in the Superior Court of California, County of Los Angeles, Case No. YA103894, for
6 violation of California Vehicle Code section 23153(b) (Causing Bodily Injury while Driving
7 with a Blood Alcohol Level of 0.08 Percent or Higher), a felony. Respondent was placed on
8 three years of formal probation, and ordered to serve 365 days in jail and pay restitution, fines
9 and fees.

10 4.

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

14 5.

15 The crime of which Respondent was convicted, as described in Paragraph 3
16 above, constitutes cause under sections 490 and 10177(b)(1) of the Code for the suspension or
17 revocation of all the licenses and license rights of Respondent under the Real Estate Law.

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Accusation of JENNIFER KAY NATERS

SECOND CAUSE OF ACTION
(FAILURE TO REPORT CONVICTION)

6.

Pursuant to Code section 10186.2, a licensee shall report, in writing, “the conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any felony or misdemeanor” to the Department of Real Estate (“Department”) within 30 days of the conviction. Respondent failed to report in writing to the Department the conviction described in Paragraph 3 above, within thirty (30) days of the conviction date (April 26, 2023).

Respondent’s failure to timely report the conviction constitutes cause under section 10186.2 of the Code for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

7.

Code section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department of Real Estate, 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 the investigation and enforcement of the case.

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Accusation of JENNIFER KAY NATERS

1 WHEREFORE, Complainant prays that a hearing be conducted on the
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3 disciplinary action against all the licenses, license endorsements, and license rights of
4 Respondent JENNIFER KAY NATERS under the Real Estate Law, for the cost of
5 investigation and enforcement as permitted by law, and for such other and further relief as may
6 be proper under other applicable provisions of law.

7
8 Dated at Los Angeles, California

9 this 23rd day of February, 2024

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11 _____
12 Ray Dagnino
13 Supervising Special Investigator

14 cc: JENNIFER KAY NATERS
15 Dynacore Inc
16 Ray Dagnino
17 Sacto.
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Accusation of JENNIFER KAY NATERS