

1 LAURENCE D. HAVESON, Counsel (SBN 152631)
2 Department of Real Estate
3 320 West 4th Street, Suite 350
4 Los Angeles, California 90013-1105
5 Telephone: (213) 559-5990
6 Direct: (213) 559-5699
7 Fax: (213) 576-6917
8 Email: Laurence.Haveson@dre.ca.gov
9 Attorney for Complainant

FILED

APR 10 2025

DEPT. OF REAL ESTATE

By- [REDACTED]

10 BEFORE THE DEPARTMENT OF REAL ESTATE
11 STATE OF CALIFORNIA

12 In the Matter of the Accusation of
13 NATALYA KONISHCHEVA,
14 Respondent.

No. H-43068-LA
ACCUSATION

15 The Complainant, Ray Dagnino, a Supervising Special Investigator for the Department of
16 Real Estate ("Department" or "DRE") of the State of California, for cause of Accusation against
17 NATALYA KONISHCHEVA, also known as Natalya Vladimrova Konishcheva, and Natalia V.
18 Konichtcheva ("Respondent"), is informed and alleges:

19 1. The Complainant, Ray Dagnino, acting in his official capacity as a Supervising
20 Special Investigator, makes this Accusation against Respondent.

21 2. Respondent presently has license rights under the Real Estate Law, Part 1 of Division
22 4 of the California Business and Professions Code ("Code"), as a real estate salesperson ("RES")
23 (DRE license identification number 01880169). Respondent's license was previously suspended
24 pursuant to Code section 494.5 from on or about July 19, 2014, through on or about September 2,
25 2014, and from on or about October 26, 2020, through on or about November 12, 2020, for failure
26 to comply with a tax delinquency.

FIRST CAUSE OF ACCUSATION

(Criminal Conviction)

27 3. On or about May 29, 2024, in the Superior Court for the State of California, Santa
28 Barbara County, in the case of *People of the State of California v. Natalya Vladimrova Konishcheva*,

ACCUSATION

1 Case No. 22CR07528, Respondent was convicted based on her guilty plea for violations of Vehicle
2 Code section 23153(b) (driving with a .08% blood alcohol causing injury (Count 2)), a felony, and
3 Vehicle Code section 23152(b) (driving while having a 0.08% or higher blood alcohol (Count 4)),
4 a felony. On or about June 26, 2024, The court sentenced Respondent to be committed to State
5 Prison for four (4) years, but suspended execution of judgment and granted Respondent supervised
6 probation for five (5) years on terms and conditions including but not limited to: serving 120 days
7 jail time, with credit for 12 days; paying restitution in an amount to be determined; paying fees, an
8 assessment, and a restitution fine; completing an alcohol/drug treatment program; not drinking or
9 possessing any alcoholic beverages; and having her driver's license suspended for a period of three
10 (3) years.

11 4. In aggravation, on or about January 24, 2018, in the Superior Court for the State of
12 California, Santa Barbara County, in the case of *People of the State of California v. Natalya*
13 *Vladimrova Konishcheva*, Case No. 18CR00091, Respondent was convicted based on her plea of
14 no contest for violating Penal Code section 647(f) (public intoxication (liquor)), a misdemeanor.
15 The court sentenced Respondent to two (2) days of jail time, with credit for two (2) days, and ordered
16 Respondent to pay a fine and a fee.

17 5. In aggravation, on or about October 4, 2017, in the Superior Court for the State of
18 California, Santa Barbara County, in the case of *People of the State of California v. Natalya*
19 *Vladimrova Konishcheva*, Case No. 17CF08435, Respondent was convicted based on her plea of no
20 contest for violating Penal Code section 647(f) (public intoxication (liquor)), a misdemeanor. The
21 court placed Respondent on Supervised Probation for a period of three (3) years, subject to terms
22 and conditions including but not limited to: serving 61 days of jail time; paying a fine and a fee;
23 completing the Clean and Sober treatment program; and abstaining from drinking for three (3) years.

24 6. In aggravation, on or about December 27, 2016, in the Superior Court for the State
25 of California, Santa Barbara County, in the case of *People of the State of California v. Natalya*
26 *Vladimrova Konishcheva*, Case No. 1498397, Respondent was convicted based on her plea of no
27 contest for violations of Vehicle Code sections 23152(a) (driving under the influence of alcohol
28 (Count 1)), and 14601 (driving while license revoked (Count 2)), both misdemeanors. The court

1 suspended imposition of sentence and placed Respondent on probation for five (5) years, subject to
2 terms and conditions including but not limited to: serving 150 days jail time, with credit for four (4)
3 days; paying a fine; completing at least 18 months in a state licensed education and counseling
4 program for multiple offenders; abstaining from drinking for three (3) years; not operating a vehicle
5 unless it is equipped with an ignition interlock device; and wearing a Secure Continuous Remote
6 Alcohol Monitoring ("SCRAM") bracelet for 150 days.

7 7. In aggravation, on or about July 7, 2015, in the Superior Court for the State of
8 California, Santa Barbara County, in the case of *People of the State of California v. Natalya*
9 *Vladimrova Konishcheva*, Case No. 1476773, Respondent was convicted based on her plea of no
10 contest for violating Penal Code section 415(1) (disturbing the peace), a misdemeanor. The court
11 ordered Respondent to pay a fine.

12 8. In aggravation, on or about February 11, 2015, in the Superior Court for the State of
13 California, Santa Barbara County, in the case of *People of the State of California v. Natalya*
14 *Vladimrova Konishcheva*, Case No. 1472856, Respondent was convicted based on her plea of no
15 contest for violating Penal Code section 415(2) (maliciously and willfully disturbing another
16 person), a misdemeanor. The court suspended imposition of sentence and placed Respondent on
17 unsupervised probation for three (3) years, subject to terms and conditions including but not limited
18 to paying a fine, and not driving unless in position of a valid California driver's license, registration,
19 and insurance.

20 9. In aggravation, on or about December 15, 2014, in the Superior Court for the State
21 of California, Santa Barbara County, in the case of *People of the State of California v. Natalya*
22 *Vladimrova Konishcheva*, Case No. 1472193, Respondent was convicted based on her plea of no
23 contest for violating Penal Code section 415(2) (maliciously and willfully disturbing another
24 person), a misdemeanor. The court ordered Respondent to pay a fine.

25 10. In aggravation, on or about September 18, 2013, in the Superior Court for the State
26 of California, Santa Barbara County, in the case of *People of the State of California v. Natalya*
27 *Vladimrova Konishcheva*, Case No. 1430756, Respondent was convicted based on her plea of no
28 contest for violating Penal Code section 647(f) (public intoxication (liquor)), a misdemeanor. The

1 court sentenced Respondent to serve four (4) days of jail time, with credit for four (4) days, and
2 ordered Respondent to pay a fine and fees.

3 11. In aggravation, on or about June 5, 2013, in the Superior Court for the State of
4 California, Santa Barbara County, in the case of *People of the State of California v. Natalya*
5 *Vladimrova Konishcheva*, Case No. 1428966, Respondent was convicted based on her plea of no
6 contest for violation of Vehicle Code sections 23152(b) (driving while having a 0.08% or higher
7 blood alcohol), a misdemeanor. The court suspended imposition of sentence and placed Respondent
8 on supervised probation for three (3) years, subject to terms and conditions including but not limited
9 to: serving 365 days jail time, suspended for three (3) years; serving 55 days jail time, with credit
10 for four (4) days; paying a fine and a fee; paying restitution; completing at least 18 months in a state
11 licensed education and counseling program for multiple offenders; and completing DUI school.

12 12. In aggravation, on or about February 10, 2012, in the Superior Court for the State of
13 California, Santa Barbara County, in the case of *People of the State of California v. Natalya*
14 *Vladimrovn Konishcheva*, Case No. 1401244, Respondent was convicted based on her plea of no
15 contest for violation of Vehicle Code sections 23152(b) (driving while having a 0.08% or higher
16 blood alcohol), a misdemeanor. The court suspended imposition of sentence and placed Respondent
17 on supervised probation for three (3) years, subject to terms and conditions including but not limited
18 to: serving 120 days jail time, suspended for three (3) years; serving four (4) days jail time, with
19 credit for four (4) days; paying a fine and a fee; and completing 50 AA meetings. paying restitution;
20 completing nine (9) months of a state licensed education and counseling program for first offenders;
21 and completing DUI school.

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

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

28 ///

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2

3
4

5
6
7
8
9
10
11
12
13
14
15
16

17
18
19
20
21
22
23
24
25
26
27
28

1 in the Santa Barbara County Superior Court, Case No. 1428966, Respondent was convicted for
2 violation of Vehicle Code section 23152(b); and, on or about March 2, 2017, in the Santa Barbara
3 County Superior Court, Case No. 1498397, Respondent was convicted for violation of Vehicle Code
4 section 23152(a). The Amended Felony Complaint also alleged as to Counts 3 and 4: Respondent
5 had a blood alcohol content of .15 percent and higher within the meaning of Vehicle Code section
6 23578; and pursuant to Vehicle Code section 23546, that Respondent suffered the following prior
7 convictions within the last 10 years: on or about June 5, 2013, in the Santa Barbara County Superior
8 Court, Case No. 1428966, Respondent was convicted for violation of Vehicle Code section
9 23152(b); and, on or about December 27, 2016, in the Santa Barbara County Superior Court, Case
10 No. 1498397, Respondent was convicted for violation of Vehicle Code section 23152(a).

11 18. On or about March 15, 2024, in the Superior Court for the State of California, Santa
12 Barbara County, in the case of *People of the State of California v. Natalya Vladimrova Konishcheva*,
13 Case No. 22CR07528, an Information ("Felony Information") was filed charging Respondent with
14 violating: Vehicle Code section 23153(a) (driving under the influence of alcohol causing injury
15 (Count 1)), a felony; Vehicle Code section 23153(b) (driving with a .08% blood alcohol causing
16 injury (Count 2)), a felony; Vehicle Code section 23152(a) (driving under the influence of alcohol
17 (Count 3)), a misdemeanor; Vehicle Code section 23152(b) (driving while having a 0.08% or higher
18 blood alcohol (Count 4)), a misdemeanor. The Felony Information also alleged as to Counts 1 and
19 2: pursuant to Vehicle Code section 23566(a), within 10 years of the offenses in Counts 1 and 2,
20 Respondent committed two separate violations of Vehicle Code section 23103 as specified in
21 Vehicle Code sections 23103.5, or 23152 or 23153, or any combination of these violations, that
22 resulted in the following convictions: on or about June 5, 2013, in the Santa Barbara County
23 Superior Court, Case No. 1428966, Respondent was convicted for violation of Vehicle Code section
24 23152(b); and, on or about March 2, 2017, in the Santa Barbara County Superior Court, Case No.
25 1498397, Respondent was convicted for violation of Vehicle Code section 23152(a). The Felony
26 Information also alleged as to Counts 3 and 4: Respondent had a blood alcohol content of .15 percent
27 and higher within the meaning of Vehicle Code section 23578; and pursuant to Vehicle Code section
28 23546, that Respondent suffered the following prior convictions within the last 10 years: on or about

1 June 5, 2013, in the Santa Barbara County Superior Court, Case No. 1428966, Respondent was
2 convicted for violation of Vehicle Code section 23152(b); and, on or about December 27, 2016, in
3 the Santa Barbara County Superior Court, Case No. 1498397, Respondent was convicted for
4 violation of Vehicle Code section 23152(a).

5 19. Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, "The
6 bringing of a criminal complaint, information, or indictment charging a felony against the licensee,"
7 and "The conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest,
8 of any felony or misdemeanor" to the Department within thirty (30) days of the of the date of the
9 bringing of the indictment or the charging of a felony, and of the conviction. Respondent failed to
10 report in writing to the Department the bringing of criminal complaints and an information charging
11 felonies against her, as alleged in Paragraphs 16 through 18 above, and her conviction, as alleged in
12 Paragraph 3 above, within thirty (30) days of the bringing of criminal complaints and an information
13 charging felonies against her and her conviction.

14 20. Respondent's failure to timely report the bringing of criminal complaints and an
15 information charging felonies against her and her conviction violates Code section 10186.2 and
16 constitutes cause under Code sections 10186.2 and 10177(d) and/or 10177(g) for the suspension or
17 revocation of the license and license rights of Respondent under the Real Estate Law.

18 THIRD CAUSE OF ACCUSATION

19 (Failure to Disclose Conviction and Pending Criminal Charges in License Renewal Application)

20 21. Complainant realleges and incorporates by reference the allegations contained in
21 contained in the previous paragraphs as though fully set forth herein.

22 22. As alleged in further detail above in Paragraphs 4 and 5, on or about January 24,
23 2018, and October 4, 2017, in the Superior Court for the State of California, Santa Barbara County,
24 in the cases of *People of the State of California v. Natalya Vladimrova Konishcheva*, Case Nos.
25 18CR00091 and 17CF08435, Respondent was twice convicted for violating Penal Code section
26 647(f) (public intoxication (liquor)), a misdemeanor.

27 23. As alleged in further detail above in Paragraphs 16 through 18, on or about October
28 24, 2022, June 22, 2023, and March 15, 2024, in the Superior Court for the State of California, Santa

1 Barbara County, in the case of *People of the State of California v. Natalya Vladimirova Konishcheva*,
2 Case No. 22CR07528 ("Case No. 22CR07528"), a Felony Complaint, an Amended Felony
3 Complaint, and a Felony Information, respectively, were filed against Respondent. The felony
4 charges in Case No. 22CR07528 were pending against Respondent until her conviction on or about
5 May 29, 2024.

6 24. On or about May 23, 2023, Respondent submitted a Salesperson Renewal
7 Application, DRE form RE 209, to the DRE to renew her California real estate salesperson license
8 stating as follows:

9 a. In response to Question 12 of the renewal application, under
10 "BACKGROUND INFORMATION," to wit, "WITHIN THE SIX-YEAR PERIOD PRIOR
11 TO FILING THIS APPLICATION, HAVE YOU EVER BEEN CONVICTED
12 (SEEPARAGRAPH ON PAGE 1) OF ANY VIOLATION OF THE LAW AT THE
13 MISDEMEANOR OR FELONY LEVEL? IF YES, COMPLETE ITEM 18 WITH
14 INFORMATION ON EACH CONVICTION." Respondent marked the checkbox for "NO."

15 b. In response to Question 13 of the renewal application, under
16 "BACKGROUND INFORMATION," to wit, "ARE THERE CRIMINAL CHARGES
17 PENDING AGAINST YOU AT THIS TIME, OR ARE YOU CURRENTLY AWAITING
18 JUDGMENT AND SENTENCING FOLLOWING ENTRY OF A PLEA OR JURY
19 VERDICT? IF YES, COMPLETE ITEM 18." Respondent marked the checkbox for "NO."

20 25. Respondent's failure to disclose her convictions in Case Nos. 18CR00091 and
21 17CF08435, as set forth in Paragraphs 4 and 5 above, and her failure to disclose the felony charges
22 filed on or about October 24, 2022, June 22, 2023, and March 15, 2024, in Case No. 22CR07528,
23 as set forth in Paragraphs 16 through 18 above, in her Salesperson Renewal Application constitutes
24 the procurement, or attempted procurement, of a license renewal by fraud, misrepresentation, or
25 deceit, or by making a material misstatement of fact in an application for license renewal, and
26 constitutes cause for the suspension or revocation of a real estate license under Code section
27 10177(a).

28 ///

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

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 the licenses and license rights of Respondent NATALYA KONISHCHEVA under the Real Estate Law, for the costs of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law.

Ray Dagnino
Supervising Special Investigator