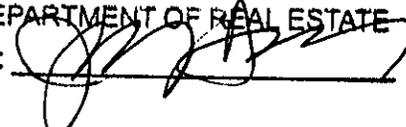


1 CHERYL D. KEILY SBN# 94008
2 Department of Real Estate
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FILED

APR 27 2011

DEPARTMENT OF REAL ESTATE
BY: 

8
9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-37228 LA
13 TONY NELSON,) A C C U S A T I O N
14 Respondent.)
15 _____)

16 The Complainant, Maria Suarez, a Deputy Real Estate
17 Commissioner of the State of California, for cause of Accusation
18 against TONY NELSON ("Respondent") is informed and alleges as
19 follows:
20

21 1.

22 The Complainant, Maria Suarez, a Deputy Real Estate
23 Commissioner of the State of California, makes this Accusation
24 in her official capacity.

25 2.

26 Respondent NELSON is presently licensed and/or has
27 license rights under the Real Estate Law (Part 1 of Division 4

1 of the Business and Professions Code, hereinafter the "Code") as
2 a real estate broker.

3 3.

4 On or about January 13, 2008, the John Meyer and Tina
5 Meyer (the "Meyers") executed a grant deed transferring title to
6 certain real property known as 1801 Forrest Lane, San
7 Bernardino, California 92407 (the "Property"), from themselves
8 to Respondent. The transfer of title was given in connection
9 with an agreement between the Meyers and Respondent for the
10 completion of construction repairs to a structure located on the
11 Property.

12 4.

13 At an unknown time thereafter and without the Meyers'
14 knowledge or consent, Respondent altered the grant deed to the
15 Property described in Paragraph 3, above, to falsely represent
16 that the transfer of title to the Property was a bona fide gift
17 and that the Meyers had received nothing in exchange for their
18 transfer of title to the Property.
19

20 5.

21 On or about May 1, 2008, Respondent presented the
22 altered grant deed described in Paragraph 3, above, to the San
23 Bernardino County Recorder with the intent to thereby evade the
24 requirement that he pay the amount of the San Bernardino County
25 Document Transfer Tax.
26

27 6.

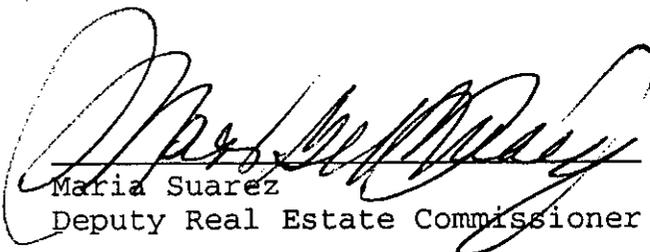
The conduct, acts and/or omissions of Respondent, as

1 described herein above, constitutes making a substantial
2 misrepresentation, and/or fraud or dishonest dealing, and is
3 cause for the suspension or revocation of all real estate
4 licenses and license rights of Respondent under the provisions
5 of Code Section 10177(j).

6 WHEREFORE, Complainant prays that a hearing be
7 conducted on the allegations of this Accusation and that upon
8 proof thereof, a decision be rendered imposing disciplinary
9 action against all the licenses and license rights of Respondent
10 TONY NELSON under the Real Estate Law, and for such other and
11 further relief as may be proper under other applicable
12 provisions of law.

13 Dated at Los Angeles, California

14 this 25th day of April, 2011.

15
16
17
18
19 
20 Maria Suarez
21 Deputy Real Estate Commissioner
22
23

24 cc: TONY NELSON
25 Maria Suarez
26 Sacto.
27