JULIE L. TO, Counsel (SBN 219482) Department of Real Estate 320 West 4th Street, Suite 350 Los Angeles, California 90013-1105 3 DEC 0 1 2011 Telephone: (213) 576-6982 (213) 576-6916 (Direct) DEPARTMENT OF REALESTATE 5 7 8 BEFORE THE DEPARTMENT OF REAL ESTATE 9 STATE OF CALIFORNIA 10 11 In the Matter of the Accusation of No. H- 37705 LA 12 LAURA P. CISNEROS ACCUSATION . 13 Respondent. 14 15 16 The Complainant, Maria Suarez, a Deputy Real Estate 17 Commissioner of the State of California, for cause of Accusation 18 against LAURA P. CISNEROS ("Respondent") is informed and 19 alleges as follows: 20 1. 21 The Complainant, Maria Suarez, a Deputy Real Estate 22 Commissioner of the State of California, makes this Accusation 23 in her official capacity. 24 2. 25 Respondent is presently licensed and/or has license 26 rights under the Real Estate Law, Part 1 of Division 4 of the 27 California Business and Professions Code ("Code"), as a real

estate broker. Respondent was originally licensed as a salesperson with the Department on or about July 19, 1993.

Respondent was licensed as a broker with the Department on or about October 15, 1999.

3.

## (PRIOR DISCIPLINARY ACTION)

On November 13, 2007, in Case No. H-33957 LA, the Real Estate Commissioner suspended the real estate broker license of Respondent pursuant to Business and Professions Code Sections 10177(d),10177(g), and 10177(h), effective January 2, 2008.

Respondent's real estate broker license was suspended for a period of ninety (90) days for various violations, including: failure to maintain the trust fund accounts (Code Section 10145 and Section 2832.1, 2950(d), 2950(g), and 2951 of Chapter, 6, Title 10, California Code of Regulations (hereinafter "Regulations")); failure to maintain accurate and complete transaction records (Code Section 10145 and Regulations 2831, 2950(d), 2951; permitting and unlicensed and unbonded person to be an authorized signatory on escrow trust accounts (Code Section 10145 and Regulations 2834, 2950(d) and 2951); conducting escrow activities prior to obtaining branch office licenses from the Department (Code Section 10163 and Regulation 2715); failure to disclose financial interest and ownership of the companies escrow division (Code Section 10145 and Regulation 2950(h); negligence; and failure, as designated officer to a corporate broker licensee, to supervise and control the activities conducted on behalf of the corporation by its

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officers, managers and employees as necessary to secure full compliance with the provisions of the Real Estate Law (Code Section 10159.2).

4.

On or about April 28, 2011, in the Superior Court of the State of California, County of San Bernardino, in Case No. MWV1100975, Respondent was convicted of violating Penal Code Section 484(a) (theft of personal property), a misdemeanor. Respondent was sentenced to 24 months probation, 40 hours of community service/work sentence, and ordered to pay fines and stay away from Nordstrom Rack.

5.

In aggravation, on or about May 2, 2011, in the Superior Court of the State of California, County of San Bernardino, in Case No. TVI800350, Respondent was convicted of violating Penal Code Section 415.2 (loud/unreasonable noise), a misdemeanor. Respondent was sentenced to 24 months probation and ordered to pay fines.

6.

The conviction described in Paragraph 4, by its facts and circumstances, bears a substantial relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real estate licensee.

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7. The crime of which Respondent was convicted, as described in Paragraph 4, constitutes cause under Sections 490 and 10177(b) of the Code for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law. /// 11.1 11.1 

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, LAURA P. CISNEROS, under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code) and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California this // day of // day of

Maria Suarez

Depaty Real Estate Commissioner

cc: LAURA P. CISNEROS Maria Suarez Sacto.