

FILE

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FILED

APR 17 2014

BUREAU OF REAL ESTATE

[Signature]

BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

In the Matter of the Accusation of)	No. H-2881 FR
)	
ERICA A. BURDG,)	<u>ACCUSATION</u>
)	
Respondent.)	
)	

The Complainant, JOE CARRILLO, acting in his official capacity as a Managing Deputy Real Estate Commissioner of the State of California, for cause of Accusation against ERICA A. BURDG ("Respondent"), is informed and alleges as follows:

1.

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

2.

On or about September 11, 2013, in the Superior Court of the State of California, County of Stanislaus, Case No. 1254497, Respondent was convicted of violating Business and Professions Code section 17500 (making false or misleading statements), a misdemeanor which bears a substantial relationship under section 2910, title 10, California Code of Regulations to the qualifications, functions or duties of a real estate licensee.

1 3.

2 The facts alleged above in Paragraph 2 constitute grounds under sections 490
3 and 10177(b) of the Code for suspension or revocation of all licenses and license rights of
4 Respondent under Part 1 of Division 4 of the Code (herein "the Real Estate Law").

5 COST RECOVERY

6 4.

7 The Bureau will seek to recover cost of this suit pursuant to section 10106 of the
8 Code which provides, in pertinent part, that in any order issued in resolution of a disciplinary
9 proceeding before the Bureau, the commissioner may request the administrative law judge to
10 direct a licensee found to have committed a violation of this part to pay a sum not to exceed the
11 reasonable costs of the investigation and enforcement of the case.

12 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
13 of this Accusation and that upon proof thereof, a decision be rendered revoking all licenses and
14 license rights of Respondent under the Real Estate Law, for the cost of investigation and
15 enforcement as permitted by law, and for such other and further relief as may be proper under
16 other provisions of law.

17 

18 JOE CARRILLO
19 Managing Deputy Real Estate
Commissioner

20 Dated at Sacramento, California,
21 this 17 day of April, 2014.

22 DISCOVERY DEMAND

23 Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the Department
24 hereby makes demand for discovery pursuant to the guidelines set forth in the *Administrative*
25 *Procedure Act*. Failure to provide Discovery to the Department may result in the exclusion of
26 witnesses and documents at the hearing or other sanctions that the Office of Administrative
27 Hearings deems appropriate.