

August 12, 2011

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DEPARTMENT OF REAL ESTATE

By 

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8 BEFORE THE
9 DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of)
) H-5666 SAC
13 JOHN STEPHEN LUCAS,)
) ACCUSATION
14 Respondent.)
15 _____)

16 The Complainant, TRICIA D. SOMMERS, in her official capacity as a Deputy
17 Real Estate Commissioner of the State of California, for cause of Accusation against JOHN
18 STEPHEN LUCAS (hereinafter "Respondent"), is informed and alleges as follows:

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

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24 On or about November 12, 2009, in the Superior Court of the State of California,
25 County of Placer, in Case No. 41-150037, Respondent was convicted of violating Section
26 4462.5 of the California Vehicle Code (Display False Registration Tags on Vehicle - With
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1 Intent to Avoid Registration Requirements), a misdemeanor and a crime which bears a
2 substantial relationship under Section 2910, Title 10, of the California Code of Regulations,
3 to the qualifications, functions, or duties of a real estate licensee.

4 3

5 The facts alleged in Paragraph 2, above, constitute cause under Sections 490
6 (Conviction of Crime) and 10177(b) (Conviction of Crime Substantially Related to
7 Qualifications, Functions or Duties of Real Estate Licensee) of the Code for suspension or
8 revocation of all licenses and license rights of Respondent under the Real Estate Law.

9 WHEREFORE, Complainant prays that a hearing be conducted on the
10 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
11 disciplinary action against all licenses and license rights of Respondent under the Real Estate
12 Law (Part 1 of Division 4 of the Business and Professions Code), and for such other and further
13 relief as may be proper under the provisions of law.

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16 
17 TRICIA D. SOMMERS
18 Deputy Real Estate Commissioner

19 Dated at Sacramento, California,
20 this 4th day of August, 2011.