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**FILED**

SEP 26 2016  
BUREAU OF REAL ESTATE  
By B. Nicholas

8 BEFORE THE BUREAU OF REAL ESTATE  
9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of )  
12 JEREMIAH BISHOP, JR., )  
13 Respondent. )

No. H- 12022 SF  
ACCUSATION

14 The Complainant, ROBIN S. TANNER, in her official capacity as a Supervising  
15 Special Investigator of the Bureau of Real Estate of the State of California ("Bureau") brings this  
16 Accusation against JEREMIAH BISHOP, JR ("Respondent") and is informed and alleges as  
17 follows:

18 1

19 Respondent is presently licensed by the Bureau and/or has license rights under the  
20 Real Estate Law, Part 1 of Division 4 of the California<sup>1</sup> Business and Professions Code ("Code")  
21 as a real estate salesperson.

22 FIRST CAUSE OF ACTION

23 Criminal Conviction

24 2

25 On or about March 25, 2016, in the Superior Court of California, County of  
26

27 <sup>1</sup> All references are to California Codes and Regulations, unless otherwise specifically stated.

1 Alameda, Case No. H58360, Respondent was convicted of violating Section 487(A) of the  
2 California Penal Code (grand theft of personal property), a felony and a crime which bears a  
3 substantial relationship under Section 2910, Title 10, of the California Code of Regulations  
4 ("Regulations"), to the qualifications, functions, or duties of a real estate licensee.

5 3

6 The allegations contained at Paragraph 2, above, constitute cause pursuant to  
7 Section 10177(b) (conviction of a crime substantially related to the qualifications, functions or  
8 duties of a real estate licensee) and Section 490 (conviction of a crime) of the Code for the  
9 suspension or revocation of all licenses and license rights of Respondent under the Real Estate  
10 Law.

11 SECOND CAUSE OF ACTION

12 Failure to Disclose within Thirty (30) Days

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14 Each and every allegation contained at Paragraphs 1 through 3, inclusive, is  
15 incorporated by reference as if fully set forth herein.

16 5

17 A diligent search was made of the records of the Bureau relating to Respondent's  
18 real estate license. As a result of said search no written record was discovered having been  
19 received from Respondent notifying the Bureau in writing and within 30 days of either the  
20 bringing of an indictment or the charging of a felony, the conviction of Respondent of one or  
21 more misdemeanor and/or felony convictions, and/or any disciplinary action taken by another  
22 licensing agency.

23 6


24 The allegations contained at Paragraphs 2 and 5, above, constitute cause under  
25 Sections 10177(d) (willful disregard or violation of the Real Estate Law) and 10186.2 (failure  
26 to disclose) of the Code for the suspension or revocation of all licenses and license rights of  
27 Respondent under the Real Estate Law.

1  
2 Cost Recovery

3 7

4 Section 10106 of the Code provides, in pertinent part, that in any order issued in  
5 resolution of a disciplinary proceeding before the Bureau, the Real Estate Commissioner may  
6 request the Administrative Law Judge to direct a licensee found to have committed a violation  
7 of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement  
8 of the case.

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

14  
15   
16 ROBIN S. TANNER  
17 Supervising Special Investigator

18 Dated at Oakland, California,  
19 this 9<sup>th</sup> day of August, 2016.

20  
21 DISCOVERY DEMAND

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