

FILED

APR 05 2017

BUREAU OF REAL ESTATE

By M. Roberts

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BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Application of)
) NO. H-3096-FR
RAMANPAL SINGH GILL,)
) ACCUSATION
Respondent.)

The Complainant, BRENDA SMITH, acting in her official capacity as a
Supervising Special Investigator of the State of California, for this Accusation against
RAMANPAL SINGH GILL ("Respondent"), is informed and alleges as follows:

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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 ("the Code") as a real estate
broker.

CRIMINAL CONVICTION

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On or about January 21, 2016, in the Superior Court of California, County of
Fresno, case No. M16911060, Respondent was convicted of violating section 2108 of the
California Unemployment Insurance Code (willfully fail or refuse to make workers'
compensation insurance contributions), a misdemeanor and a crime that bears a substantial

relationship to the qualifications, functions or duties of a real estate licensee pursuant to section 2910, Title 10, of the California Code of Regulations.

GROUNDS FOR DISCIPLINE

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The facts alleged in Paragraph 2, above, constitute cause under Sections 490 (conviction of crime) and 10177(b) (conviction of crime substantially related to the qualifications, functions or duties of a real estate licensee) of the Code for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

COST RECOVERY

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

WHEREFORE, the Complainant prays that the above-entitled matter be set for hearing and, upon proof of the charges contained herein, that the Commissioner refuse to authorize the issuance of, and deny the issuance of, a real estate salesperson/broker license to Respondent, and for such other and further relief as may be proper under applicable provisions of law.

BRENDA SMITH
Supervising Special Investigator

Dated at Fresno, California,

this 3 day of April, 2017.

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DISCOVERY DEMAND

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

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