

Sachs Glas

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FILED

AUG - 6 2013

BUREAU OF REAL ESTATE

By 

BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

* * *

11	In the Matter of the Accusation of)	No. H-04513 SD
12	MICHAEL JOSEPH STEPHEN MILLER,)	<u>A C C U S A T I O N</u>
13	Respondent.)	
14)	

15 The Complainant, Veronica Kilpatrick, a Deputy Real
16 Estate Commissioner of the State of California for cause of
17 Accusation against MICHAEL JOSEPH STEPHEN MILLER aka Michael
18 Miller ("Respondent") alleges as follows:

19 1.

20 The Complainant, Veronica Kilpatrick, a Deputy Real
21 Estate Commissioner of the State of California, makes this
22 Accusation in her official capacity.

23 2.

24 Respondent is presently licensed and/or has license
25 rights under the Real Estate Law, Part 1 of Division 4 of the
26 California Business and Professions Code as a real estate
27 salesperson.

1 (CRIMINAL CONVICTION)

2 3.

3 On or about August 23, 2010, in the Superior Court of
4 California, County of San Diego, in case no. CN279019,
5 Respondent was convicted of California Penal Code Section 484-
6 488 (theft), a misdemeanor. This crime is substantially related
7 to the qualifications, functions, or duties of a real estate
8 licensee under Section 2910, Title 10, Chapter 6, California
9 Code of Regulations.

10 4.

11 The crime of which Respondent was convicted, as
12 described above, constitutes cause under California Business and
13 Professions Code Sections 490 and 10177(b) for the suspension or
14 revocation of the license and license rights of Respondent under
15 the Real Estate Law.

16 California Business and Professions Code Section 10106
17 provides, in pertinent part, that in any order issued in
18 resolution of a disciplinary proceeding before the Bureau, the
19 Commissioner may request the administrative law judge to direct
20 a licensee found to have committed a violation of this part to
21 pay a sum not to exceed the reasonable costs of investigation
22 and enforcement of the case.

23 WHEREFORE, Complainant prays that a hearing be
24 conducted on the allegations of this Accusation and that upon
25 proof thereof, a decision be rendered imposing disciplinary
26 action against all licenses and/or license rights under the Real
27 Estate Law (Part 1 of Division 4 of the California Business and

1 Professions Code) of Respondent MICHAEL JOSEPH STEPHEN MILLER
2 for the cost of investigation and enforcement as permitted by
3 law, and for such other and further relief as may be proper
4 under applicable provisions of law.

5 Dated at San Diego, California: July 31, 2013.

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8 Veronica Kilpatrick
9 Deputy Real Estate Commissioner
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26 cc: MICHAEL JOSEPH STEPHEN MILLER
27 Wyndham Vacation Ownership, Inc.
Veronica Kilpatrick
Sacto.