

FILED

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BUREAU OF REAL ESTATE

By *Cal Davis*

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8 BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11	In the Matter of the Accusation of)	No.H-04954 SD
)	
12	TIFFANY MICHELLE HOWELL,)	<u>ACCUSATION</u>
)	
13	Respondent.)	
)	

15 The Complainant, Veronica Kilpatrick, a Supervising
16 Special Investigator of the State of California, for cause of
17 accusation against TIFFANY MICHELLE HOWELL, alleges as follows:

18 1. The Complainant, Veronica Kilpatrick, a Supervising
19 Special Investigator of the State of California, makes this
20 Accusation in her official capacity.

21 2. TIFFANY MICHELLE HOWELL (hereinafter referred to as
22 "Respondent") presently has license rights under the Real Estate
23 Law (Part 1 of Division 4 of the Business and Professions Code,
24 hereinafter referred to as the "Code").
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1 3. Respondent was licensed by the Bureau of Real
2 Estate of the State of California as a real estate salesperson
3 effective July 2, 2012. The license expires December 7, 2019.

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5 4. On or about March 2, 2017, in the County of San
6 Diego, Superior Court of California, case No. M2252244CA,
7 Respondent was convicted of violating Penal Code section
8 243(e)(1) (battery of a current or former significant other) and
9 Penal Code section 594(a)(b)(2)(A) (vandalism under \$400).

10 5. The above referenced matters bear a substantial
11 relationship to the qualifications, functions, or duties of a
12 real estate licensee, Title 10, Chapter 6, Section 2910,
13 California Administrative Code.

14 6. Respondent failed to report the convictions to the
15 Bureau which conduct subjects her real estate license to
16 disciplinary action under sections 10186.2 and 10177(d) of the
17 Code.

18 7. Respondent's convictions alleged in Paragraph 4 are
19 cause under Code Sections 490 and 10177(b) for suspension or
20 revocation of all licenses and license rights of Respondent under
21 the Real Estate Law.

22
23 Business and Professions Code Section 10106 provides,
24 in pertinent part, that in any order issued in resolution of a
25 disciplinary proceeding before the Bureau, the Commissioner may
26 request the administrative law judge to direct a licensee found
27 to have committed a violation of this part to pay a sum not to

1 exceed the reasonable costs of the investigation and enforcement
2 of the case.

3 WHEREFORE, Complainant prays that a hearing be
4 conducted on the allegations of this Accusation and that upon
5 proof thereof, a decision be rendered imposing disciplinary
6 action on the license and license rights of Respondent, for the
7 cost of investigation and enforcement as permitted by law, under
8 the Real Estate Law (Part 1 of Division 4 of the Business and
9 Professions Code) and for such other and further relief as may be
10 proper under other applicable provisions of law.

11 Dated at San Diego, California,

12 this 16 day of November, 2017.

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15 VERONICA KILPATRICK
16 Supervising Special Investigator

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25 cc: Tiffany Michelle Howell
26 Veronica Kilpatrick
27 Sacto.