

FILED

MAR 02 2015

BUREAU OF REAL ESTATE

By S. Black

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BEFORE THE BUREAU OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of:	)	No. H-6227 SAC
	)	
RAMAN DEEP GILL,	)	<u>ACCUSATION</u>
	)	
Respondent.	)	
	)	

The Complainant, TRICIA D. PARKHURST, acting in her official capacity as a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against RAMAN DEEP GILL ("Respondent"), is informed and alleges as follows:

1.

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

PRESENT CRIMINAL CONVICTION

2.

On or about November 14, 2014, in the Superior Court of the State of California, County of Sacramento, Case No. 12F05921, Respondent was convicted of violating three counts of Penal Code section 191.5(b) (vehicular manslaughter), and one count of Vehicle Code section 23153(a) (driving under the influence of alcohol causing death), all felonies which bear

1 a substantial relationship under title 10, section 2910, of the California Code of Regulations
2 ("the Regulations") to the qualifications, functions or duties of a real estate licensee.

3 3.

4 The facts alleged above in Paragraph 2 constitute grounds under sections 490
5 and 10177(b) of the Business and Professions Code ("the Code") for suspension or revocation
6 of all licenses and license rights of Respondent under the Real Estate Law.

7 FAILURE TO NOTIFY BUREAU OF CRIMINAL CHARGES

8 4.

9 A diligent search was made of the records of the Bureau of Real Estate
10 ("Bureau") relating to Respondent's real estate salesperson license no. 01503806. As a result of
11 said search, no record was discovered having been received from Respondent notifying the
12 Bureau, in writing, of any arrest, conviction, indictment or license disciplinary action occurring
13 on or after January 1, 2012.

14 5.

15 The facts alleged above in Paragraph 4 indicate Respondent's failure to comply
16 with sections 10186.2(a)(1)(A), 10186.2(a)(1)(B) and 10186.2(a)(2) (failure to report in writing
17 to the Bureau of an indictment or information charging a felony and/or a conviction of any
18 felony or misdemeanor against Respondent within 30 days) of the Code, which constitutes
19 cause under section 10177(d) (willful disregard or violation the Real Estate Law), for revocation
20 of all licenses and license rights of Respondent under said Real Estate Law.

21 MATTERS IN AGGRAVATION

22 6.

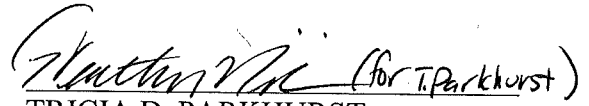
23 On or about January 20, 2011, in the Superior Court of the State of California,
24 County of Sacramento, Case No. 11T00134, Respondent was convicted of violating Vehicle
25 Code section 23103.5 (wet and reckless driving), a misdemeanor which bears a substantial
26 relationship under title 10, section 2910, of the Regulations to the qualifications, functions or
27 duties of a real estate licensee.

1 COST RECOVERY

2 7.

3 The Bureau will seek to recover costs of the investigation and prosecution of this
4 case pursuant to section 10106 of the Code which provides, in pertinent part, that in any order
5 issued in resolution of a disciplinary proceeding before the Bureau, the commissioner may
6 request the administrative law judge to direct a licensee found to have committed a violation of
7 this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of
8 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, for the costs of investigation and
12 enforcement as permitted by law, and for such other and further relief as may be proper under
13 other provisions of law.

14
15  (for T. Parkhurst)
16 TRICIA D. PARKHURST
17 Deputy Real Estate Commissioner

18 Dated at Sacramento, California, on
19 this 18th day of February, 2015.
20
21

22 DISCOVERY DEMAND

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