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**FILED**

MAR 18 2025

DEPARTMENT OF REAL ESTATE  
By J. Taggart

BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of

MICHAEL ANTHONY ZUCCOLILLO,

Respondent.

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No. H-7427-SAC

ACCUSATION

The Complainant, HEATHER NISHIMURA, a Supervising Special Investigator of the State of California, for cause of Accusation against MICHAEL ANTHONY ZUCCOLILLO ("Respondent"), is informed and alleges as follows:

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Complainant makes this Accusation against Respondent in their official capacity.

2

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

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On or about October 5, 2023, in the Superior Court of the State of California, County of Butte, Case No. 20CF01824, Respondent was convicted of violating Sections 288.3(a) (contact with minor for sexual offense) and 288.2(a) (sending harmful material to a minor) of the

1 California Penal Code, both felonies, and Section 288.4(a)(1) (arranging a meeting with a minor  
2 for lewd purposes) of the California Penal Code, a misdemeanor, and crimes which bear a  
3 substantial relationship to the qualifications, functions, or duties of a real estate licensee under  
4 Section 2910, Title 10, Chapter 6, California Code of Regulations.

5 4

6 The facts alleged in Paragraph 3, above, constitute cause under Sections 490  
7 (conviction of crime) and 10177(b) (conviction of crime) of the Code for the suspension or  
8 revocation of Respondent's license(s) under real estate law.

9 5

10 Section 10106 of the Code provides, in pertinent part, that in any order issued in  
11 resolution of a disciplinary proceeding before the Department, the commissioner may request the  
12 administrative law judge to direct a licensee found to have committed a violation of this part to  
13 pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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15 WHEREFORE, Complainant prays that a hearing be conducted on the allegations  
16 of this Accusation and that upon proof thereof, a Decision be rendered imposing disciplinary  
17 action against all licenses and license rights of Respondent under the Code, for the reasonable  
18 costs of investigation and prosecution of this case, including agency attorney's fees and for such  
19 other and further relief as may be proper under provisions of law.

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23 HEATHER NISHIMURA

24 Supervising Special Investigator

25 Dated at Sacramento, California

26 this 5<sup>th</sup> day of March, 2025.

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DISCOVERY DEMAND

The Department of Real Estate hereby requests discovery pursuant to Section 11507.6 of the California Government Code. Failure to provide discovery to the Department may result in the exclusion of witnesses and/or documents at the hearing, and other sanctions as the Administrative Law Judge deems appropriate.