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FILED
MAR 15 2013
DEPARTMENT OF REAL ESTATE

James B. Lion

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of) No. H-38764 LA
12 PATRICIA ROJAS MILLAN,) A C C U S A T I O N
13 Respondent.)
14

15 The Complainant, Maria Suarez, a Deputy Real Estate
16 Commissioner of the State of California, for cause of Accusation
17 against PATRICIA ROJAS MILLAN, ("Respondent") alleges as
18 follows:

19 1.

20 The Complainant, Maria Suarez, a Deputy Real Estate
21 Commissioner of the State of California, makes this Accusation
22 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 ("Code"), as a real
27 estate salesperson.

1 3.

2 On or about July 28, 2010, the State of California,
3 Department of Insurance, in Case No. LBB 6029-AP (AR), ordered
4 revocation of Respondent's life-only and accident and health
5 agent license and issued a restricted license. As more fully
6 set forth in the Accusation for this case, the Insurance
7 Commissioner found that Respondent failed to timely report her
8 conviction of a crime substantially related to the
9 qualifications, functions, or duties of an insurance licensee.
10 This provided grounds for license discipline pursuant to
11 California Insurance Code Sections 1668(b), (i) and (l), 1738
12 and 1729.2.

13 4.

14 The allegations set forth in Paragraph 3 above
15 constitute cause under Section 10177(f) of the Code for the
16 suspension or revocation of the license and license rights of
17 Respondent under the Real Estate Law.

18 5.

19 In aggravation, on or about December 3, 2009, in the
20 Superior Court of California, County of Orange, in case no.
21 09WM10528, Respondent was convicted of violating California
22 Vehicle Code Section 4462.5 (presentation of false registration
23 or identification documents to avoid registration requirements),
24 a misdemeanor.

25 6.

26 In aggravation, on or about June 5, 1989, in the
27 Superior Court of California, County of Orange, in case no.

1 C-72820, Respondent was convicted of violating California Health
2 and Safety Code Section 11351 (possession for sale of a
3 controlled substance), a felony.

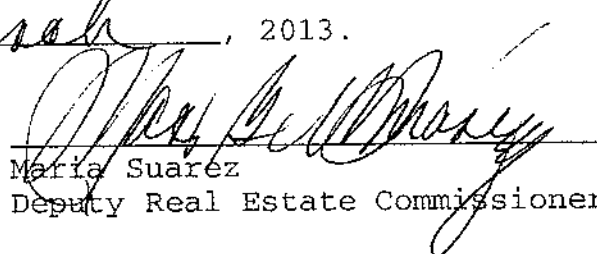
4 7.

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

12 WHEREFORE, Complainant prays that a hearing be
13 conducted on the allegations of this Accusation and that upon
14 proof thereof, a decision be rendered imposing disciplinary
15 action against all the licenses and license rights of Respondent
16 PATRICIA ROJAS MILLAN, under the Real Estate Law, that
17 Complainant be awarded its costs of investigation and prosecution
18 of this case, and for such other and further relief as may be
19 proper under other applicable provisions of law.

20 Dated at Los Angeles, California

21 this 8th day of March, 2013.

22
23 
24 Maria Suarez
Deputy Real Estate Commissioner

25 cc: PATRICIA ROJAS MILLAN
26 Realty One Group Inc
27 Maria Suarez
Sacto.