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FILED

AUG 28 2017

BUREAU OF REAL ESTATE

By John Agul

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8
9 BEFORE THE BUREAU OF REAL ESTATE
10 STATE OF CALIFORNIA

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12 In the Matter of the Accusation of) No. H-40756 LA
13 MICHAEL DORSAY,) A C C U S A T I O N
14 Respondent.)
15 _____)

16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
17 State of California, for cause of Accusation against MICHAEL DORSAY ("Respondent"), is
18 informed and alleges as follows:

19 1.

20 The Complainant, Veronica Kilpatrick, acting in her official capacity as a
21 Supervising Special Investigator of the State of California, makes this Accusation against
22 MICHAEL DORSAY.

23 2.

24 Respondent presently has license rights under the Real Estate Law, Part 1 of
25 Division 4 of the California Business and Professions Code ("Code"), as a real estate
26 salesperson.

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1 FIRST CAUSE OF ACTION

2 (CRIMINAL CONVICTION)

3 3.

4 On or about October 19, 2016, Respondent pled guilty and was convicted in the
5 Superior Court of California, County of Riverside, Case No. RIM1612615, for violation of
6 California Penal Code Section 243(e)(1) (Infliction Of Injury On Present Or Former Spouse,
7 Present Or Former Cohabitant, Present Or Former Fiance/Fiancee, Present Or Former Dating
8 Partner, Or Parent Of Child), a misdemeanor. Respondent was placed on 36 months of
9 summary probation, and ordered to be committed to the custody of the Riverside County
10 Sheriff's Department for 30 days and pay restitution, fines and fees. Additionally, Respondent
11 was ordered to complete a 52-week Domestic Violence Program and complete 20 hours of
12 community service.

13 4.

14 The conviction described in Paragraph 3 bears a substantial relationship under
15 Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications,
16 functions or duties of a real estate licensee.

17 5.

18 The crime of which Respondent was convicted, as described in Paragraph 3
19 above, constitutes cause under Sections 490 and 10177(b)(1) of the Code for the suspension or
20 revocation of all the licenses and license rights of Respondent under the Real Estate Law.

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Accusation of Michael Dorsay

SECOND CAUSE OF ACTION

(FAILURE TO REVEAL CONVICTION ON LICENSE RENEWAL APPLICATION)

6.

On or about March 19, 2017, Respondent certified and submitted his Salesperson Renewal Application. In response to Question 13, to wit, "WITHIN THE SIX-YEAR PERIOD PRIOR TO FILING THIS APPLICATION, HAVE YOU EVER BEEN CONVICTED (SEE PARAGRAPH ON PAGE 1) OF ANY VIOLATION OF THE LAW AT THE MISDEMEANOR OR FELONY LEVEL? IF YES, COMPLETE ITEM 19 WITH INFORMATION ON EACH CONVICTION", Respondent answered "NO," and failed to disclose the conviction described in Paragraph 3 above.

7.

Respondent's failure to reveal this conviction, as set forth in Paragraph 3 above, in his license renewal application constitutes procurement of a real estate license renewal by fraud, misrepresentation, or deceit, or by making a false statement of material fact required to be revealed in said application, and constitutes cause under Section 10177(a) of the Code for the suspension or revocation of all the licenses and license rights of Respondent under the Real Estate Law.

8.

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

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1 WHEREFORE, Complainant prays that a hearing be conducted on the
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3 disciplinary action against all the licenses and license rights of Respondent MICHAEL
4 DORSAY under the Real Estate Law, for the cost of investigation and enforcement as
5 permitted by law, and for such other and further relief as may be proper under other applicable
6 provisions of law.

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8 Dated at San Diego, California

9 this 18 day of August, 2017

10
11 V. Kilpatrick

12 Veronica Kilpatrick
13 Supervising Special Investigator

14 cc: MICHAEL DORSAY
15 Realty One Group, Inc. DBA Realty One Group
16 Veronica Kilpatrick
17 Sacto.