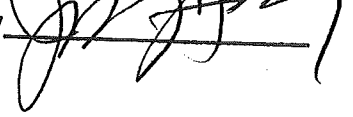


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**FILED**

JUN 24 2014

BUREAU OF REAL ESTATE

By 

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

11 \* \* \*

12 In the Matter of the Accusation of ) No. H- 04649 SD  
13 SUZETTE JACKSON, ) A C C U S A T I O N  
14 Respondent. )  
15 \_\_\_\_\_ )

16 The Complainant, Veronica Kilpatrick, a Deputy Real  
17 Estate Commissioner of the State of California, for cause of  
18 Accusation against SUZETTE JACKSON, also known as Suzette De  
19 Marsh, ("Respondent") alleges as follows:

20 1.

21 The Complainant, Veronica Kilpatrick, a Deputy Real  
22 Estate Commissioner of the State of California, makes this  
23 Accusation in her official capacity.

24 2.

25 Respondent is presently licensed and/or has license  
26 rights under the Real Estate Law, Part 1 of Division 4 of the  
27

1 California Business and Professions Code ("Code") as a real  
2 estate broker.

3 3.

4 (CRIMINAL CONVICTION)

5 On or about May 18, 2013, in the Superior Court for  
6 the State of California, County of San Diego, in Case No. CD  
7 243284, Respondent was convicted of violating California Penal  
8 Code Section 532(a) [Obtaining Property/Labor/Services by False  
9 Pretenses], a felony reduced to a misdemeanor pursuant to Penal  
10 Code Section 17b; and Business and Professions Code Section  
11 17533.7(a) [Solicitation Falsely Indicating Government  
12 Connection], a misdemeanor. The underlying facts of these crimes  
13 bear a substantial relationship under Section 2910, Title 10,  
14 Chapter 6, California Code of Regulations to the qualifications,  
15 functions or duties of a real estate licensee.

16 4.

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

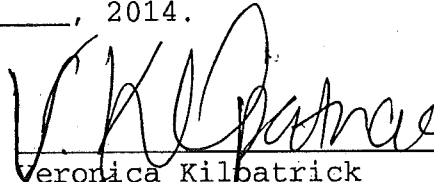
22 Code Section 10106 provides in pertinent part that in  
23 any order issued in resolution of a disciplinary proceeding  
24 before the Department, the Commissioner may request the  
25 administrative law judge to direct a licensee found to have  
26 committed a violation of this part to pay a sum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

1 the reasonable costs of investigation and enforcement of the  
2 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 against all the licenses and license rights of Respondent  
7 SUZETTE JACKSON under the Real Estate Law (Part 1 of Division 4  
8 of the Business and Professions Code), for the cost of  
9 investigation and enforcement as permitted by Code Section  
10 10106, and for such other and further relief as may be proper  
11 under other applicable provisions of law.

12 Dated at San Diego, California

13 this 17 day of June, 2014.

14 

15 \_\_\_\_\_  
16 Veronica Kilpatrick  
17 Deputy Real Estate Commissioner

18  
19  
20  
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22  
23  
24  
25  
26 cc: SUZETTE JACKSON  
27 Veronica Kilpatrick  
Sacto.