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**FILED**

JUL 23 2015

BUREAU OF REAL ESTATE

By *[Signature]*

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BEFORE THE BUREAU OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

11 In the Matter of the Accusation of ) No. H- 04736 SD  
12 JESUS DAVID BOUBION, ) A C C U S A T I O N  
13 )  
14 Respondent. )

15 The Complainant, Veronica Kilpatrick, a Supervising  
16 Special Investigator of the State of California, for cause of  
17 Accusation against JESUS DAVID BOUBION, alleges as follows:

18 1. The Complainant, Veronica Kilpatrick, acting in her  
19 official capacity as a Supervising Special Investigator of the  
20 State of California, makes this Accusation against JESUS DAVID  
21 BOUBION.

22 2. JESUS DAVID BOUBION (hereinafter referred to as  
23 "Respondent") is presently licensed and/or has license rights  
24 under the Real Estate Law (Part 1 of Division 4 of the Business  
25 and Professions Code, hereinafter Code).

26 Accusation of Jesus David Boubion  
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1           3. At all times herein mentioned, Respondent was  
2 licensed by the Bureau of Real Estate of the State of California  
3 as a real estate salesperson.

4           4. On or about August 13, 2013, Respondent dba Emerson  
5 Wright Group (not licensed by the Bureau) violated Code Section  
6 10130 of the Code by not possessing a real estate broker license  
7 during the period Respondent engaged in activities as defined by  
8 Code Section 10131(d) including negotiating for a loan  
9 modification on real property located at 4727 Via Colorado,  
10 Oceanside, California, for the owner Alicia T.

11           5. The conduct of Respondent, as alleged above,  
12 subjects his real estate license and license rights to  
13 disciplinary action pursuant to Code Sections 10177(d) and  
14 10177(j), for violation of Code section 10130.

15           Business and Professions Code Section 10106 provides,  
16 in pertinent part, that in any order issued in resolution of a  
17 disciplinary proceeding before the department, the commissioner  
18 may request the administrative law judge to direct a licensee  
19 found to have committed a violation of this part to pay a sum not  
20 to exceed the reasonable costs of the investigation and  
21 enforcement of the case.

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27           The Accusation of Jesus David Boubion

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WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all licenses and license rights under the Real Estate Law (Part 1 of Division 4 of the California Business and Professions Code) of Respondent Jesus David Boubion, for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at San Diego, California  
this 16<sup>th</sup> day of July, 2015.

  
\_\_\_\_\_  
Veronica Kilpatrick  
Supervising Special Investigator

cc: Jesus David Boubion  
Veronica Kilpatrick  
Sacto.

The Accusation of Jesus David Boubion