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FILED

JAN 30 2017

BUREAU OF REAL ESTATE

By B. Nicholas

9 BEFORE THE BUREAU OF REAL ESTATE
10 STATE OF CALIFORNIA

11 In the Matter of the Accusation of
12 WENDELL JAMON JONES,
13 Respondent.

No. H-12045 SF
ACCUSATION

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15 The Complainant, ROBIN S. TANNER, a Supervising Special Investigator of the
16 State of California, for cause of Accusation against WENDELL JAMON JONES (Respondent),
17 is informed and alleges as follows:

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20 The Complainant, ROBIN S. TANNER, a Supervising Special Investigator of the
21 State of California, makes this Accusation in her official capacity.

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

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On or about April 28, 2015, after proceedings comparable to the Administrative Procedure Act in which Respondent was given fair notice of the charges, an opportunity for a hearing, and other due process protections, the Supreme Court of the State of California, in Case No. S224370, State Bar Court Case No. 14-O-00876 and 14-O-03242, ordered that the Respondent be suspended from the practice of law for one (1) year, that execution of the suspension be stayed, and that Respondent be placed on probation for two (2) years, including an actual suspension of ninety (90) days for acts which, if done by a real estate licensee, would be grounds for the suspension or revocation of a California real estate license pursuant to the provisions of Sections 10177(d), 10177(g), 10177(q), 10176(i) and/or 10177(j) of the Code.

On or about September 4, 2014, after proceedings comparable to the Administrative Procedure Act in which Respondent was given fair notice of the charges, an opportunity for a hearing, and other due process protections the Supreme Court of the State of California, in Case No. S219304, State Bar Court Case No. 12-O-16465 and 13-O-11273, ordered that the Respondent be suspended from the practice of law for one (1) year, that execution of the suspension be stayed, and that Respondent be placed on probation for two (2) years, including an actual suspension of ninety (90) days for acts which, if done by a real estate licensee, would be grounds for the suspension or revocation of a California real estate license pursuant to the provisions of Sections 10177(d), 10177(g), 10176(i) and/or 10177(j) of the Code.

The suspension of Respondent's license to practice law in the State of California as described in Paragraphs 3 and 4, constitutes cause for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law under Sections 10177(f), 10177(j), 10177(q) and/or 10177(g) of the Code.

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1 COST RECOVERY

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

7 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
8 of this Accusation and that upon proof thereof, a decision be rendered revoking all licenses and
9 license rights of Respondent under the Real Estate Law (Part 1 of Division 4 of the Business and
10 Professions Code), for the cost of investigation and enforcement as permitted by law, and for
11 such other and further relief as may be proper under other provisions of law.

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13 ROBIN S. TANNER
14 Supervising Special Investigator

14 Dated at Fresno, California,

15 this 26th day of January, 2017
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17 DISCOVERY DEMAND

18 Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the Department of
19 Real Estate hereby makes demand for discovery pursuant to the guidelines set forth in the
20 *Administrative Procedure Act*. Failure to provide Discovery to the Department of Real Estate
21 may result in the exclusion of witnesses and documents at the hearing or other sanctions that the
22 Office of Administrative Hearings deems appropriate.
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