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7					
8	BEFORE THE BUREAU OF REAL ESTATE				
9	STATE OF CALIFORNIA				
10			* * *		
11	In the Matter	of the Accusation of	)	No. H-12045 SF	
12	W	VENDELL JAMON JONES,	)	FIRST AMENDED	
13		Respondent. ) ACCUSATION			
14	The Complainant, TRICIA D. PARKHURST, a Supervising Special Investigator				
15	of the State of California, for cause of Accusation against WENDELL JAMON JONES				
16	(Respondent), is informed and alleges as follows:				
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18	The Complainant, TRICIA D. PARKHURST, a Supervising Special Investigator				
19	of the State of California, makes this Accusation in her official capacity.				
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21	Respondent is presently licensed and/or has license rights under the Real Estate				
22	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.

On or about January 17, 2019, in the Superior Court of the State of California, County of Santa Clara, Case No. C1761423, Respondent was convicted of two counts of Sections 2944.7 (accepting advance fee for loan modification) of the Civil Code, crimes which bear a substantial relationship under Section 2910, Title 10, of the California Code of Regulations (Regulations) to the qualifications, functions or duties of a real estate licensee.

## GROUNDS FOR DISCIPLINE

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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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The facts identified in Paragraph 5, constitutes cause under Sections 490 and 10177(b) of the Code, for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

## **COST RECOVERY**

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Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Bureau, 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.

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered revoking all licenses and license rights of Respondent under the Real Estate Law (Part 1 of Division 4 of the Business and

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Professions Code), for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other provisions of law.

TRICIA D. PARKHURST
Supervising Special Investigator

## **DISCOVERY DEMAND**

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