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JAMES DEMUS, Counsel (SBN 225005)  
Bureau of Real Estate  
320 West Fourth St., #350  
Los Angeles, CA 90013  
  
(213) 576-6982  
(213) 576-6910 (direct)

**FILED**

**AUG -7 2013**

**BUREAU OF REAL ESTATE**

By Norma Simmons

BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of	)	No. H-38994 LA
	)	
MARC RAYMOND TOW,	)	<u>A C C U S A T I O N</u>
	)	
Respondent.	)	

The Complainant, Maria Suarez, a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against MARC RAYMOND TOW, alleges as follows:

I

The Complainant, Maria Suarez, acting in her official capacity as a Deputy Real Estate Commissioner of the State of California, makes this Accusation against MARC RAYMOND TOW.

II

MARC RAYMOND TOW, (hereinafter referred to as "Respondent") presently has license rights under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code, hereinafter "Code") as a broker. On December 6, 2011, Respondent's license expired. Pursuant to Code Section 10201,

1 Respondent retains renewal rights for two years. The Bureau of  
2 Real Estate holds jurisdiction over the lapsed license, pursuant  
3 to Code Section 10103.

4 III

5 On or about July 16, 2012, Respondent was disbarred  
6 from the practice of law in California by the Supreme Court of  
7 California, in Case No. S201859.

8 IV

9 As more fully set forth in the Decision and Order of  
10 Involuntary Inactive Enrollment; filed on February 3, 2012, the  
11 basis for Respondent's disbarment was violations of Rules of  
12 Professional Conduct ("RPC") 4-100(A) (failure to maintain client  
13 funds in a trust account), Code Section 6106 (moral turpitude)  
14 RPC 3-310(B)(3) (avoiding representation of adverse interests),  
15 RPC 4-100(B)(3) (failure to maintain records of client  
16 property/render appropriate accounts), RPC 4-100(B)(4) (promptly  
17 pay/deliver client funds), PRC 3-110(A) (incompetence), and RPC  
18 3-700(D)(2) (failure to refund unearned fees).

19 V

20 The allegations set forth in Paragraphs III and IV  
21 above constitute cause under Section 10177(f) of the Code for the  
22 suspension or revocation of the license and license rights of  
23 Respondent under the Real Estate Law.

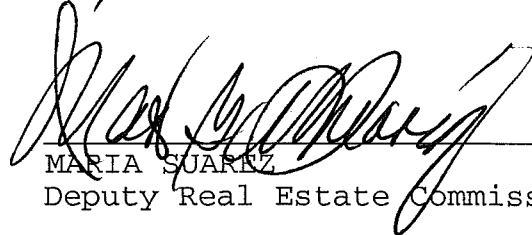
24 VI

25 Code Section 10106, provides, in pertinent part, that  
26 in any order issued in resolution of a disciplinary proceeding  
27 before the Bureau of Real Estate, the Commissioner may request

1 the administrative law judge to direct a licensee found to have  
2 committed a violation of this part to pay a sum not to exceed the  
3 reasonable costs of the investigation and enforcement of the  
4 case.

5 WHEREFORE, Complainant prays that a hearing be  
6 conducted on the allegations of this Accusation and that upon  
7 proof thereof, a decision be rendered imposing disciplinary  
8 action against all the licenses and license rights under the Real  
9 Estate Law of Respondent MARC RAYMOND TOW, for the cost of  
10 investigation and enforcement as permitted by law, and for such  
11 other and further relief as may be proper under other applicable  
12 provisions of law.

*August 6, 2013.*

  
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MARIA SUAREZ  
Deputy Real Estate Commissioner

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25 cc: Marc Raymond Tow  
26 Maria Suarez  
27 Sacto.