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FILED
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DEPARTMENT OF REAL ESTATE
By J. Taggart

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)
12) No. H-3515 FR
13 JORGE JIMENEZ RODRIGUEZ,)
14 Respondent.) ACCUSATION

15 The Complainant, RUBEN CORONADO, a Supervising Special Investigator of the
16 State of California, for Accusation against Respondent JORGE JIMENEZ RODRIGUEZ
17 (RODRIGUEZ) is informed and alleges as follows:

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19 The Complainant makes this Accusation against Respondent in her official
20 capacity.

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22 At all times herein mentioned, Respondent was and is presently licensed and/or
23 has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and
24 Professions Code (the Code); by the Department of Real Estate (DEPARTMENT) as a real
25 estate salesperson.

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At all times mentioned, Respondent engaged in the business of, acted in the capacity of, advertised or assumed to act as a real estate broker in the State of California, within the meaning of Section 10131(a) of the Code, including the operation and conduct of a residential resale brokerage wherein Respondent bought, sold, or offered to buy or sell, solicited or obtained listings of, and negotiated the purchase, sale or exchange of real property or business opportunities, all for or in expectation of compensation.

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On or about November 26, 2022, RODRIGUEZ entered into a Residential Listing Agreement with sellers Jorge V. and Jessica V. to sell that certain real property commonly known as 2917 W. Taylor, Visalia California (W. Taylor Property).

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On or about February 3, 2023, a Residential Purchase Agreement (RPA) was prepared by Buyers.

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On or about February 13, 2023, RODRIZUEZ signed the RPA and various other real estate transaction documents for Buyers without their authorization.

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When Buyers found out that RODRIGUEZ had signed documents on their behalf, they contacted RODRIGUEZ's broker, who had the transaction cancelled and terminated RODRIGUEZ from employment.

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One of the documents that RODRIGUEZ signed on behalf of buyers was a provision that seller had to purchase a new residence. Buyers, had they known, would not have agreed to that contingency.

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The facts alleged above are violations of Sections 10176(a) (substantial misrepresentation), and 10176(i) (other conduct involving fraud or dishonest dealing) and are grounds for the suspension or revocation of the licenses and license rights of Respondent under Sections 10176(a), 10176(i), 10177(d) (willful disregard/violation of real estate law), 10177(g) (negligence/incompetence real estate licensee) or 10177(j) (conduct constitutes fraud/dishonest dealing) of the Code.

Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, 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 imposing disciplinary action against all licenses and license rights of Respondents under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code), and for such other and further relief as may be proper under other provisions of law.


RUBEN CORNADO
Supervising Special Investigator

Dated at Fresno, California,
this 1st day of September, 2023

DISCOVERY DEMAND

The Department of Real Estate hereby requests discovery pursuant to Section 11507.6 of the California Government Code. Failure to provide discovery to the Department may result in the exclusion of witnesses and/or documents at the hearing, and other sanctions as the Administrative Law Judge deems appropriate.