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**FILED**

**FEB -3 2014**

**BUREAU OF REAL ESTATE**

By 

BEFORE THE BUREAU OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of )	No. H-4575 SD
TERESA ANNE ROSE, )	<u>A C C U S A T I O N</u>
Respondent. )	

The Complainant, Veronica Kilpatrick, a Deputy Real Estate Commissioner of the State of California for cause of Accusation against TERESA ANNE ROSE ("Respondent") alleges as follows:

1.

The Complainant, Veronica Kilpatrick, a Deputy Real Estate Commissioner of the State of California, makes this Accusation in her official capacity.

2.

Respondent is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code as a real estate salesperson.

1 (CRIMINAL CONVICTION)

2 3.

3 On or about January 3, 2014, in the United States  
4 District Court, Southern District of California, case no.  
5 12CR1848-JAH, Respondent was convicted of violating 18 U.S.C.  
6 section 371 and 28 U.S.C. section 2461(c) (conspiracy to commit  
7 wire fraud), a felony. This crime is substantially related to  
8 the qualifications, functions, or duties of a real estate  
9 licensee under Section 2910, Title 10, Chapter 6, California  
10 Code of Regulations.

11 4.

12 The crime of which Respondent was convicted, as  
13 described above, constitutes cause under California Business and  
14 Professions Code sections 490 and 10177(b) for the suspension or  
15 revocation of the license and license rights of Respondent under  
16 the Real Estate Law.

17 5.

18 California Business and Professions Code section 10106  
19 provides, in pertinent part, that in any order issued in  
20 resolution of a disciplinary proceeding before the bureau, the  
21 Commissioner may request the administrative law judge to direct  
22 a licensee found to have committed a violation of this part to  
23 pay a sum not to exceed the reasonable costs of investigation  
24 and enforcement of the case.

25 WHEREFORE, Complainant prays that a hearing be  
26 conducted on the allegations of this Accusation and that upon  
27 proof thereof, a decision be rendered imposing disciplinary

1 action against all licenses and/or license rights under the Real  
2 Estate Law (Part 1 of Division 4 of the California Business and  
3 Professions Code) of Respondent TERESA ANNE ROSE for the cost of  
4 investigation and enforcement as permitted by law, and for such  
5 other and further relief as may be proper under applicable  
6 provisions of law.

7 Dated at San Diego, California: January 31, 2014.

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11 Veronica Kilpatrick  
12 Deputy Real Estate Commissioner  
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25 cc: TERESA ANNE ROSE  
26 Jonathan Patrick Mann  
27 Veronica Kilpatrick  
Sacto.