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FILED

JUL 26 2016

BUREAU OF REAL ESTATE

By At Delois

7 BUREAU OF REAL ESTATE

8 STATE OF CALIFORNIA

9 \* \* \*

10 In the Matter of the Accusation of ) No. H-04815 SD  
11 JACK EVAN PROBER, ) ACCUSATION  
12 Respondent. )  
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15 The Complainant, Veronica Kilpatrick, a Supervising  
16 Special Investigator of the State of California, for cause of  
17 accusation against JACK EVAN PROBER, alleges as follows:

18 1. The Complainant, Veronica Kilpatrick, a Supervising  
19 Special Investigator of the State of California, makes this  
20 Accusation in her official capacity.

21 2. JACK EVAN PROBER (hereinafter referred to as  
22 "Respondent") is presently licensed and/or has license rights  
23 under the Real Estate Law (Part 1 of Division 4 of the Business  
24 and Professions Code, hereinafter referred to as the "Code").

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1           3. Respondent was licensed by the Bureau of Real  
2 Estate of the State of California as a real estate broker  
3 effective July 11, 2008. The license expired July 10, 2016.  
4 There is a two year right to renew.

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6           4. On or about March 11, 2016, in the US District  
7 Court, Southern District of California, case No. 14-cr-2704-BEN,  
8 Respondent was convicted of violating Title 18:371 (conspiracy to  
9 commit bank bribery), a felony.

10           5. The above referenced matter bears a substantial  
11 relationship to the qualifications, functions, or duties of a  
12 real estate licensee, Title 10, Chapter 6, Section 2910,  
13 California Administrative Code.

14           6. Respondent's conviction alleged in Paragraph 4 is  
15 cause under Code Sections 490 and 10177(b) for suspension or  
16 revocation of all licenses and license rights of Respondent under  
17 the Real Estate Law.

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

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1 WHEREFORE, Complainant prays that a hearing be  
2 conducted on the allegations of this Accusation and that upon  
3 proof thereof, a decision be rendered imposing disciplinary  
4 action on the license and license rights of Respondent JACK EVAN  
5 PROBER, for the cost of investigation and enforcement as  
6 permitted by law, under the Real Estate Law (Part 1 of Division 4  
7 of the Business and Professions Code) and for such other and  
8 further relief as may be proper under other applicable provisions  
9 of law.

10 Dated at San Diego, California,

11 this 21<sup>st</sup> day of July, 2016.

12   
13 VERONICA KILPATRICK  
14 Supervising Special Investigator

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25 cc: Jack Evan Prober  
26 Veronica Kilpatrick  
27 Sacto.