

**FILED**

JUL 21 2015

BUREAU OF REAL ESTATE

By S. Black

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8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of )  
12 )  
13 JONES COMMERCIAL, INC. and )  
14 JULI K. JONES, )  
Respondents. )

No. H-6289 SAC

ACCUSATION

15 The Complainant, HEATHER NISHIMURA, a Supervising Special Investigator  
16 of the State of California, for cause of Accusation against JONES COMMERCIAL, INC. and  
17 JULI K. JONES (Respondents), is informed and alleges as follows:

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19 The Complainant, HEATHER NISHIMURA, a Supervising Special Investigator  
20 of the State of California, makes this Accusation in her official capacity.

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22 Respondents are presently licensed and/or have license rights under the Real  
23 Estate Law, Part 1 of Division 4 of the Business and Professions Code (Code).

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25 At all times mentioned, JONES COMMERCIAL, INC. (JCI) was and is licensed  
26 by the State of California Bureau of Real Estate (Bureau) as a real estate broker corporation.

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At all times mentioned, Respondent JULI K. JONES (JONES) was and is licensed by the Bureau individually as a real estate broker, and as the designated broker officer of JCI. As said designated officer-broker, JONES was responsible pursuant to Section 10159.2 of the Code for the supervision of the activities of the officers, agents, real estate licensees, and employees of JCI for which a license is required.

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Respondents informed the Bureau that their main office address is 11121 Sun Center Drive, Suite L, Rancho Cordova, California, 95670.

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At no time prior to the date of the filing of this Accusation has the Bureau received notice from Respondents that their main office addresses has changed from 11121 Sun Center Drive, Suite L, Rancho Cordova, California, 95670.

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On or about October 27, 2014, a Special Investigator from the Bureau's Sacramento Office drove to 11121 Sun Center Drive, Suite L, Rancho Cordova, California, 95670, and found that the suite was vacant and had no signage.

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On or about December 10, 2014, an Auditor from the Bureau's Sacramento Office drove to 11121 Sun Center Drive, Suite L, Rancho Cordova, California, 95670, and found that the suite was vacant.

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The acts and/or omissions of Respondents as described above violate Section 10162 of the Code (Maintenance of Definite Place of Business Within State) and Section 2715 (Notification to Bureau of Principal Place of Business) of Title 10, California Code of Regulations, and are grounds for the revocation or suspension of all Respondents' licenses and/or license rights under Section 10177(d) (Willful Violation of Real Estate Law) of the Code.

1 COST RECOVERY

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3 Section 10106 of the Code provides, in pertinent part, that in any order issued in  
4 resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the  
5 Administrative Law Judge to direct a licensee found to have committed a violation of this part to  
6 pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

7 WHEREFORE, Complainant prays that a hearing be conducted on the allegations  
8 of this Accusation and that upon proof thereof, a decision be rendered imposing discipline on all  
9 licenses and license rights of Respondents under the Real Estate Law (Part 1 of Division 4 of the  
10 Business and Professions Code), for the cost of the investigation and enforcement of this case as  
11 permitted by law, for the cost of the Bureau's audit as permitted by law, and for such other and  
12 further relief as may be proper under other provisions of law.

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14   
15 HEATHER NISHIMURA  
16 Deputy Real Estate Commissioner

17 Dated at Sacramento, California,

18 this 20<sup>th</sup> day of July, 2015

19 DISCOVERY DEMAND

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