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FILED

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BUREAU OF REAL ESTATE

By K. Contreras

8 BEFORE THE
9 BUREAU OF REAL ESTATE
10 STATE OF CALIFORNIA

11 ***

12 In the Matter of the Accusation of)
13)
14 JEFFREY DELL ENSLEN,)
15)
Respondent.)

NO. H-11690 SF

ACCUSATION

16 The Complainant, ROBIN S. TANNER, in her official capacity as a Deputy
17 Real Estate Commissioner of the State of California, for cause of Accusation against JEFFREY
18 DELL ENSLEN ("Respondent"), is informed and alleges as follows:

19 1

20 Respondent is presently licensed and/or has license rights by the Bureau of Real
21 Estate ("the Bureau") as a real estate salesperson under the Real Estate Law, Part 1 of Division 4
22 of the Business and Professions Code ("the Code").

23 2

24 On or about May 14, 2013, in the Superior Court of the State of California,
25 County of Santa Clara, Case No. C1243052, Respondent was convicted of violating Section
26 484/487(B)(3) of the California Penal Code (grand theft by employee, agent or servant), a
27 misdemeanor and a crime which bears a substantial relationship under Section 2910, Title 10,

1 California Code of Regulations, to the qualifications, functions or duties of a real estate
2 licensee.

3 3

4 The facts alleged in Paragraph 2, above, constitute cause under Sections 490
5 (conviction of crime) and 10177(b) (conviction of crime) of the Code for suspension or
6 revocation of all licenses and license rights of Respondent under the Real Estate Law.

7 4

8 Respondent failed to notify the Bureau within thirty (30) days of being indicted
9 for the conviction set forth in Paragraph 2, above. Such acts and/or omissions by Respondent
10 violate Section 10186.2 of the Code, and constitute cause under Section 10177(d) (willful
11 disregard of Real Estate Law) of the Code for suspension or revocation of all licenses and license
12 rights of Respondent under the Real Estate Law.

13 COST RECOVERY

14 5

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

20 WHEREFORE, Complainant prays that a hearing be conducted on the
21 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
22 disciplinary action against all licenses and license rights of Respondent under the Code, and for
23 such other and further relief as may be proper under the provisions of law.

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25
26 Dated at Oakland, California,
27 this 29th day of April, 2014.


ROBIN S. TANNER
Deputy Real Estate Commissioner