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FILED

APR 11 2012

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DEPARTMENT OF REAL ESTATE

BY: 

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8
9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H- 38038 LA
13 FELIPE JIMENEZ,)
14) A C C U S A T I O N
15)
16 Respondent.)

17 The Complainant, Robin Trujillo, a Deputy Real Estate
18 Commissioner of the State of California, for cause of Accusation
19 against FELIPE JIMENEZ, (hereafter "Respondent") is informed and
20 alleges as follows:

21 1.

22 The Complainant, Robin Trujillo, a Deputy Real Estate
23 Commissioner of the State of California, makes this Accusation
24 in her official capacity.

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2.

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2 Respondent is presently licensed and/or has license
3 rights under the Real Estate Law (Part 1 of Division 4 of the
4 Business and Professions Code, hereinafter "Code"), as a real
5 estate broker. The broker license of Respondent was suspended
6 indefinitely on or about August 17, 2010. Pursuant to Code
7 Section 10103 the Department retains jurisdiction.

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9 3.

10 On or about July 28, 2009, the final judgment of the
11 United States District Court, Central District of California,
12 Case No. CV 08-00743, was entered against Respondent based on
13 the grounds of fraud, misrepresentation, or deceit with
14 reference to a transaction for which a real estate license is
15 required. An award of punitive damages in the amount of
16 \$67,228.65 was made against Respondent.

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18 4.

19 The facts set forth in Paragraph 3 constitute cause
20 under Section 10177.5 of the Code for the suspension or
21 revocation of all licenses and license rights of Respondent
22 under the Real Estate Law.

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24 5.

25 On July 14, 2010, the Commissioner, based on the
26 judgment referred to in paragraph 3, above, issued a decision
27 directing payment from the Recovery Account of the sum of
\$27,793.15 to Loren Roberson and Mary Roberson and against the
license of Respondent. The decision was based on a determination

1 that the judgment was based on fraud in connection with acts for
2 which a real estate license was required.

3 WHEREFORE, Complainant prays that a hearing be
4 conducted on the allegations of this Accusation and that upon
5 proof thereof a decision be rendered imposing disciplinary
6 action against all licenses and/or license rights of Respondent
7 FELIPE JIMENEZ under the Real Estate Law for the cost of
8 investigation and enforcement as permitted by law, and for such
9 other and further relief as may be proper under applicable
10 provisions of law.

11 Dated at Los Angeles, California

12 this 9 day of April, 2012.

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17 Robin Trujillo
18 Deputy Real Estate Commissioner

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26 cc: FELIPE JIMENEZ
27 Robin Trujillo
Sacto.