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**FILED**

JUL 09 2012

DEPARTMENT OF REAL ESTATE  
BY: *[Signature]*

BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

11 In the Matter of the Accusation of )	No. H- 38243 LA
12 JACOB LIBMAN, )	<u>A C C U S A T I O N</u>
13 Respondent. )	
14 _____ )	

15 The Complainant, Maria Suarez, a Deputy Real Estate  
16 Commissioner of the State of California for cause of Accusation  
17 against JACOB LIBMAN ("Respondent") alleges as follows:

18 1.

19 The Complainant, Maria Suarez, a Deputy Real Estate  
20 Commissioner of the State of California, makes this Accusation  
21 in her official capacity.

22 2.

23 Respondent is presently licensed and/or has license  
24 rights under the Real Estate Law, Part 1 of Division 4 of the  
25 California Business and Professions Code, as a real estate  
26 broker. Respondent's salesperson license expired on February 5,  
27 2011. The Department of Real Estate retains jurisdiction over

1 the suspended license pursuant to California Business and  
2 Professions Code Section 10103.

3  
4 (CRIMINAL CONVICTION)

5 3.

6 On or about February 8, 2010, the Superior Court of  
7 California, County of Los Angeles, in case no. BA350437,  
8 Respondent was convicted of violating California Health and  
9 Safety Code section 11352(a) (transportation or sale of  
10 controlled substance), a felony. This crime is substantially  
11 related to the qualifications, functions, or duties of a real  
12 estate licensee under Section 2910, Title 10, Chapter 6,  
13 California Code of Regulations.

14 4.


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

20 California Business and Professions Code Section 10106  
21 provides, in pertinent part, that in any order issued in  
22 resolution of a disciplinary proceeding before the department,  
23 the Commissioner may request the administrative law judge to  
24 direct a licensee found to have committed a violation of this  
25 part to pay a sum not to exceed the reasonable costs of  
26 investigation and enforcement 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 against all licenses and/or license rights under the Real  
5 Estate Law (Part 1 of Division 4 of the California Business and  
6 Professions Code) of Respondent JACOB LIBMAN for the cost of  
7 investigation and enforcement as permitted by law, and for such  
8 other and further relief as may be proper under applicable  
9 provisions of law.

10                   Dated at Los Angeles, California: 20 June,  
11 2012.

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15 Maria Suarez  
16 Deputy Real Estate Commissioner  
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25 cc: JACOB LIBMAN  
26 Maria Suarez  
27 Sacto.