

FILED

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BUREAU OF REAL ESTATE

By 

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9 **BEFORE THE BUREAU OF REAL ESTATE**

10 **STATE OF CALIFORNIA**

11 * * *

12 In the Matter of the Accusation of) No. H- 39763 LA
13)
14 JORGE CARLOS CACERES,) A C C U S A T I O N
15) Respondent.)
16 _____)

17 The Complainant, Veronica Kilpatrick, a Deputy Real Estate Commissioner of
18 the State of California, for cause of Accusation against JORGE CARLOS CACERES
19 (“Respondent”), alleges as follows:

20 1.

21 The Complainant, Veronica Kilpatrick, a Deputy Real Estate Commissioner of
22 the State of California, makes this Accusation in her official capacity.

23 2.

24 Respondent presently has license rights under the Real Estate Law, Part 1 of
25 Division 4 of the California Business and Professions Code (“Code”), as a real estate broker.

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Accusation of Jorge Carlos Caceres

1 FIRST CAUSE OF ACTION

2 (CRIMINAL CONVICTION)

3 3.

4 On or about February 7, 2014, Respondent pled guilty and was convicted in the
5 Superior Court of California, County of Los Angeles, Case No. BA400187, for violation of the
6 California Civil Code Section 2945.4(a) (Foreclosure Consultant Unlawful Collection Of
7 Advance Fees), a felony. Respondent was placed on three years of summary probation, and
8 ordered to pay restitution, fines and fees. Additionally, Respondent was ordered to perform
9 200 hours of community service.

10 4.

11 This conviction bears a substantial relationship under Section 2910, Title 10,
12 Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real
13 estate licensee.

14 5.

15 The crime of which Respondent was convicted, as described in Paragraph 3
16 above, constitutes cause under Sections 490 and 10177(b) of the Code for the suspension or
17 revocation of the license and license rights of Respondent under the Real Estate Law.

18 SECOND CAUSE OF ACTION

19 (FAILURE TO REPORT CONVICTION)

20 6.

21 Pursuant to Code Section 10186.2, a licensee shall report, in writing, "the
22 conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any
23 felony or misdemeanor" to the Bureau within 30 days of the conviction. Respondent failed to
24 report in writing to the Bureau the conviction described in Paragraph 3 above, within thirty (30)
25 days (March 10, 2014) of the conviction date. Respondent's failure to timely report the
26 conviction constitutes cause under Section 10186.2 of the Code for the suspension or
27 revocation of the license and license rights of Respondent under the Real Estate Law.

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7.

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

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all the licenses and license rights of Respondent JORGE CARLOS CACERES under the Real Estate Law for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at San Diego, California
this 9th day of February, 2015



Veronica Kilpatrick
Deputy Real Estate Commissioner

cc: JORGE CARLOS CACERES
Veronica Kilpatrick
Sacto.