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**FILED**

**JAN 25 2018**

**BUREAU OF REAL ESTATE**

By *[Signature]*

BEFORE THE BUREAU OF REAL ESTATE  
STATE OF CALIFORNIA

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In the Matter of the Accusation of	)	No. H-40923 LA
	)	
RANDELL JERMAINE JACKSON,	)	<u>ACCUSATION</u>
	)	
Respondent.	)	

The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California, acting in her official capacity, for cause of Accusation against RANDELL JERMAINE JACKSON ("Respondent") alleges as follows:

1.

All references to the "Code" are to the California Business and Professions Code, all references to the "Real Estate Law" are to Part 1 of Division 4 of the Code, and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

2.

Respondent is presently licensed and/or has license rights under the Real Estate Law as a real estate salesperson. Respondent was originally licensed as a real estate salesperson on June 25, 2015, and his license is due to expire on June 24, 2019.

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(CRIMINAL CONVICTION)

3.

On or about January 21, 2016, in the Superior Court of California, County of Los Angeles, in Case No. 5DY07212, Respondent was convicted of violating Penal Code Section 368(c) (Elder Abuse - Great Bodily Harm Not Likely), a misdemeanor. This crime is substantially related to the qualifications, functions or duties of a real estate licensee under Regulation 2910.

4.

Respondent's criminal conviction, as described above, constitutes cause under Code Sections 490 and 10177(b) for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

5.

Respondent did not report the conviction in writing to the Bureau of Real Estate ("Bureau") within 30 days, in violation of Code Section 10186.2.

6.

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 investigation and enforcement of the case.

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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 RANDELL JERMAINE JACKSON 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 Los Angeles, California: 22 January 2018.

  
Maria Suarez  
Supervising Special Investigator

cc: Randell Jermaine Jackson  
Forward Management Cerritos, Inc. / Nick Resendez  
Maria Suarez  
Sacto.