1 2 3 4 5	Kevin H. Sun, Counsel (SBN 276539) Department of Real Estate 320 West 4th Street, Suite 350 Los Angeles, California 90013-1105 Telephone: (213) 576-6982 Fax: (213) 576-6917 Email: Kevin.Sun@dre.ca.gov Attorney for Complainant  FILED  MAY 0 9 2022  DEPT. OF REAL ESTATE  By  The state of the	
7	BEFORE THE DEPARTMENT OF REAL ESTATE	
9	STATE OF CALIFORNIA	
10	***	
11		
	In the Matter of the Accusation of ) No. H-42048 LA	
12	JONATHAN AARON BLOOM, ) <u>FIRST AMENDED</u>	
13	Respondent. ) <u>ACCUSATION</u>	
L4		
L5		
L6	This First Amended Accusation amends the Accusation filed on June 24, 2021.	
L7	The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California,	
18	for cause of Accusation against JONATHAN AARON BLOOM, ("Respondent") alleges as	
19	follows:	
20	1.	
1	The Complainant, Maria Suarez, a Supervising Special Investigator of the State	
2	of California, makes this Accusation in her official capacity.	
3	2.	
4	All references to the "Code" are to the California Business and Professions Code	
5	and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.	
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7		

LICENSE	HISTORY
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3.

- a. Respondent has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code, as a real estate salesperson ("RES"), Department of Real Estate<sup>1</sup> ("Department") license ID 02004524.
- b. The Department originally issued Respondent's RES license on or about April 20, 2016.
- c. Respondent's RES license is scheduled to expire on April 19, 2024, unless renewed.

## CAUSE FOR DISCIPLINE

## (LICENSE DISCIPLINE BY ANOTHER AGENCY)

4.

## October 15, 2020; Secretary of State ("SOS") Case No. 2020-0216-AD

On or about October 15, 2020, in Case No. 2020-0216-AD, the SOS ordered, pursuant to a Default Decision, the revocation of Respondent's notary public commission (commission No. 2207525). The allegations against Respondent included failure to fully and faithfully discharge the duties or responsibilities required of a notary public and knowingly completed a false certificate. Respondent failed to respond to the accusation filed by the SOS and the Default Decision was entered against Respondent.

5.

The facts of the case is as follows: on or about August 8, 2019, the SOS received a complaint that Respondent engaged in misconduct in the notarization of two quitclaim deeds dated December 5, 2018 and December 26, 2018 on behalf of James T. The complaint alleges that James T. was coerced into signing the two quitclaim deeds by his family. While

<sup>&</sup>lt;sup>1</sup> Between July 1, 2013 and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate under the Department of Consumer Affairs.

	II .
1	Respondent was not present at the signing, he allowed one of the family members to take his
2	seal and use it to fraudulently notarize the deeds.
3	6.
4	Thereafter, the SOS sought to inspect Respondent's notary journal records.
5	Respondent was sent certified letters on February 21, 2020, April 22, 2020, and June 8, 2020.
6	Respondent failed to respond to any of the SOS's letters of inquiry.
7	7.
8	The prior license discipline against Respondent, as alleged in Paragraphs 4, 5,
9	and 6 above, constitutes cause for the denial of Respondent's application for a real estate
10	license under Code Section 10177(f).
11	8.
12	These proceedings are brought under the provisions of Section 10100, Division
13	4 of the Business and Professions Code of the State of California and Sections 11500 through
14	11528 of the California Government Code.
15	COSTS
16	9.
17	Code Section 10106 provides, in pertinent part, that in any order issued in
18	resolution of a disciplinary proceeding before the Department, the Commissioner may request
19	the administrative law judge to direct a licensee found to have committed a violation of this part
20	to pay a sum not to exceed the reasonable costs of investigation and enforcement of the case.
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## **PRAYER**

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 licenses and/or license rights under the Real Estate Law (Part 1 of Division 4 of the California Business and Professions Code) of Respondent JONATHAN AARON BLOOM, for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under applicable provisions of law.

Dated at Los Angeles, California this \_\_\_\_\_ 9th \_\_day of \_\_\_\_\_\_, 2022.

Maria Suarez

Maria Suarez

Supervising Special Investigator

cc: JONATHAN AARON BLOOM

Maria Suarez Sacto.