

FILED

MAR 21 2023

DEPT. OF REAL ESTATE

By 

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8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of: No. H-42578-LA
12 JESUS FLORES, ACCUSATION
13 Respondent.
14

15 Complainant, Jason Parson, a Supervising Special Investigator for the Department of Real
16 Estate (“Department”) of the State of California, for cause of Accusation against JESUS FLORES
17 (“Respondent”), is informed and alleges in his official capacity as follows:

- 18 1. The Complainant, Jason Parson, acting in his official capacity as a Supervising
19 Special Investigator, makes this Accusation against Respondent
- 20 2. Respondent presently has license rights under the Real Estate Law, Part 1 of Division
21 4 of the California Business and Professions Code (“Code”), as a real estate salesperson (License
22 ID 01989361).

23 FIRST CAUSE OF ACCUSATION

24 (CRIMINAL CONVICTION)

- 25 3. On or about September 22, 2021, a felony complaint was filed against Respondent
26 in the Superior Court of California, County of Riverside, in the case of *The People of the State of*
27 *California v. Jesus Flores, et al.*, Case No. RIF2104065 (“felony complaint”). The felony complaint
28 alleged nine (9) felony counts against Respondent and a co-defendant as follows:

1 a. Count 1: Violation of Penal Code section 115, a felony, for willfully,
2 unlawfully, and knowingly procuring and offering a false and forged instrument in the form
3 of a grant deed for 21827 Oakwood Street, Perris, California.

4 b. Count 2: Violation of Penal Code section 530.5(a), a felony, for willfully and
5 unlawfully obtaining personal identifying information of another person, Mario S. and using
6 that information for an unlawful purpose, on or about October 20, 2019.

7 c. Count 3: Violation of Penal Code section 115, a felony, for willfully,
8 unlawfully, and knowingly procuring and offering a false and forged instrument in the form
9 of a grant deed for 17701 Corte Soledad, Moreno Valley, California.

10 d. Count 4: Violation of Penal Code section 530.5(a), a felony, for willfully and
11 unlawfully obtaining personal identifying information of another person, Christos C., and
12 using that information for an unlawful purpose, on or about December 31, 2019.

13 e. Count 5: Violation of Penal Code section 115, a felony, for willfully,
14 unlawfully, and knowingly procuring and offering a false and forged instrument in the form
15 of a grant deed for 17693 Camino San Simeon, Moreno Valley, California.

16 f. Count 6: Violation of Penal Code section 530.5(a), a felony, for willfully and
17 unlawfully obtaining personal identifying information of another person, Christos C., and
18 using that information for an unlawful purpose, on or about December 31, 2019.

19 g. Count 7: Violation of Penal Code section 487(a), a felony, for willfully and
20 unlawfully stealing, taking, and defrauding money of Dennis C. of approximately \$246,000.

21 h. Count 8: Violation of Penal Code section 487(a), a felony, for willfully and
22 unlawfully stealing, taking, and defrauding money of Thomas K. of approximately
23 \$180,000.

24 i. Count 8: Violation of Penal Code section 487(a), a felony, for willfully and
25 unlawfully stealing, taking, and defrauding money of Thomas K. of approximately
26 \$180,000.

27 j. Count 9: Violation of Penal Code section 487(a), a felony, for willfully and
28 unlawfully stealing, taking, and defrauding money of Robert G. of approximately \$180,000.

1 in writing to the Department the criminal complaint charging nine (9) felonies against Respondent,
2 described in Paragraph 3 above, within thirty (30) days of the bringing of the criminal complaint
3 charging the felonies.

4 10. Respondent's failure to timely report the bringing of the criminal complaint charging
5 nine (9) felonies constitutes cause under Code sections 10186.2 and 10177(d) and/or 10177(g) of
6 the Code for the suspension or revocation of the license and license rights of Respondent under the
7 Real Estate Law.


8 COSTS

9 (COSTS OF INVESTIGATION AND ENFORCEMENT)

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

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

20 Dated at Los Angeles, California this 17th day of March, 2023.

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23 _____
24 Jason Parson
25 Supervising Special Investigator

26 cc: JESUS FLORES
27 Excellence RE Real Estate Inc.
28 Jason Parson
Sacto.