

**BEFORE THE IOWA REAL ESTATE COMMISSION
1920 S.E. HULSIZER
ANKENY, IOWA**

IN RE:)	
)	CASE NUMBER: 09-191
Krista M. Jackson)	
Salesperson (S44877))	
)	STIPULATION AND
RESPONDENT)	VOLUNTARY SURRENDER
INACTIVE)	OF SALESPERSON LICENSE
)	
5801 Oakwood Drive)	
Lincoln, Nebraska 68516)	

The Iowa Real Estate Commission (Commission) and **Krista M. Jackson** (Respondent) enter into this Combined Statement of Charges, Informal Settlement Agreement, and Consent Order in a Disciplinary Case (Order) pursuant to Iowa Code Sections 17A.10(1) and 272C.3(4) (2009).

1. The Commission issued the Respondent a real estate salesperson license number S44877 on May 4, 2004. Respondent's license is currently Inactive and in full force and effect until December 31, 2009.

2. The Commission has jurisdiction of this disciplinary matter pursuant to Iowa Code chapters 17A, 272C, and 543B (2009). Licenses issued by the Commission are subject to the laws of the State of Iowa and to the administrative rules of the Commission.

STATEMENT OF CHARGES

COUNT I

3. The Respondent is charged with failing to notify the Commission of a conviction of an offense within ten days of the conviction in violation of Iowa Code sections 543B.15(3)(a)(2); 543B.15(3)(a)(2)(c); 543B.15(6)(2009) and 193E Iowa Administrative Code sections 4.5(5); 18.1(17A, 272C, 543B); 18.14(1)(a) & (c); 18.14(5)(s).

COUNT II

4. The Respondent is charged as a result of a conviction in Polk County District Court for Theft., a violation of Windsor Heights Municipal Code 24.77, Iowa Code chapter 543B.15(3)(a)(2), 543B.15(3)(a)(2)(c); 543B.15(6); 543B.29(1)(c)(2009) and 193E Iowa Administrative Code sections 4.5(5); 18.1(17A, 272C, 543B); 18.14(1)(a) & (c); 18.14(5)(s).

CIRCUMSTANCES

5. Respondent was convicted of a charge of Theft on February 26, 2009.
6. The Respondent failed to notify the Commission of the Theft conviction within the ten day requirement.

SETTLEMENT AGREEMENT

7. Respondent admits each and every allegation in the above-stated Statement of Charges.
8. Respondent acknowledges that she has a right to receive notice of the above-stated charges and to request a hearing before the Commission on the merits of the charges. By freely and voluntarily entering into this Order, the Respondent waives her right to notice and a hearing and all attendant rights, including the right to seek judicial review. This Order constitutes discipline against the Respondent, and is the final agency order in this contested case pursuant to Iowa Code section 17A.10 and 193 Iowa Administrative Code 7.4.
9. Respondent agrees that the State's attorney and/or Commission staff may present this Order to the Commission and may have *ex parte* communications with the Commission while presenting it. Respondent waives any right of notice of this meeting or any right that the Respondent might have to participate in the discussion of this Order among the Commission, the Commission staff and the State's attorney.
10. This Order shall be part of the permanent record of Respondent and shall be considered by the Commission in determining the nature and severity of any future disciplinary action to be imposed in the event of any future violations of the laws and rules governing the practice of real estate by the Respondent.
11. Failure to comply with the terms of this Order shall be prima facie evidence of a violation of Iowa Code sections 543B.29(3), 543B.34(2) and 272C.3(2)(a) (2009) and shall be grounds for further disciplinary action. However, no action may be taken against the Respondent for violations of this Order without a hearing, or waiver of hearing.
12. This Order is not binding on the Iowa Real Estate Commission until it has been formally approved by a majority of the Commission members.
 - (a) In the event that this Order is rejected by the Commission it shall be of no force or effect to either party, and it shall not be admissible for any purpose in further proceedings in this matter.
 - (b) If the Commission approves this Order, it shall fully dispose of all issues in this case.

13. Upon acceptance by both the Commission and Respondent, this Combined Statement of Charges, Informal Settlement and Consent Order shall be a public record available for inspection and copying in its entirety in accordance with the requirements of Iowa Code chapter 22 (2009).

CONSENT ORDER

14. **IT IS THEREFORE ORDERED:** Respondent's Iowa Real Estate Salesperson License S44877 is **SURRENDERED** for an indefinite time and not less than five years.

15. **RESPONDENT ACKNOWLEDGES** that the effective date of surrender shall be the date this Stipulation is accepted by the Commission.

16. **RESPONDENT FURTHER ACKNOWLEDGES** that Iowa law allows the Respondent to reapply for an Iowa Real Estate License if the surrender or revocation took place five (5) years (or longer) prior to reapplication, **AND** that the Respondent must qualify as a salesperson starting over as if never licensed, **AND** that reapplication may or may not be granted by the Iowa Real Estate Commission and that the violation of law herein may provide a basis for denial.

WHEREFORE, the terms of this Stipulation and Voluntary Surrender of License is agreed to by the Iowa Real Estate Commission and the Respondent.

FOR THE RESPONDENT:

Voluntarily agreed to and accepted by **Krista M. Jackson** on this _____ day of _____, 2009.

KRISTA M. JACKSON, Respondent

State of _____)
County of _____)

Signed and sworn to before me on this _____ day of _____, 2009, by

Notary Public, State of Iowa
Printed Name: _____
My Commission Expires: _____

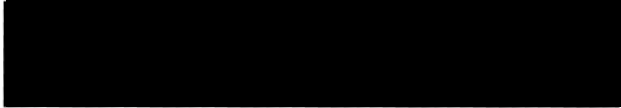


KRISTA M. JACKSON, Respondent

State of)

County of)

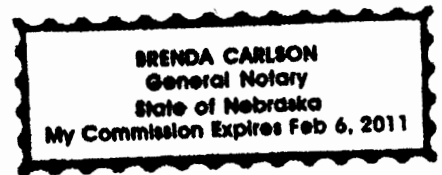
Signed and sworn to before me on this 1 day of December, 2009, by



Notary Public, State of ~~Iowa~~ Nebraska

Printed Name: Brenda Carlson

My Commission Expires: 2-6-2011



FOR THE COMMISSION:

Voluntarily agreed to and accepted by the **IOWA REAL ESTATE COMMISSION** on this 21 day of January, 2009



LAURIE DAWLEY, Chair

Iowa Real Estate Commission