


1 LAURENCE D. HAVESON, Counsel (SBN 152631)
2 Department of Real Estate
3 320 West 4th Street, Suite 350
4 Los Angeles, California 90013-1105
5 Telephone: (213) 576-6982
6 Direct: (213) 576-6911
7 Fax: (213) 576-6917
8 *Attorney for Complainant*

FILED

DEC 10 2020

DEPT. OF REAL ESTATE
By 

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of) No. H-05168 SD
JASON TAD KOEHN,) ACCUSATION
Respondent.)

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator for the Department of Real Estate ("Department") of the State of California, for cause of Accusation against JASON TAD KOEHN ("Respondent"), is informed and alleges in her official capacity as follows:

1. The Complainant, Veronica Kilpatrick, acting in her official capacity as a Supervising Special Investigator, makes this Accusation against Respondent.
2. Respondent presently has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code ("Code"), as a real estate salesperson (License ID 02026123).

FIRST CAUSE OF ACCUSATION

(CRIMINAL CONVICTION)

3. On or about July 9, 2019, in the San Diego County Superior Court, Case No. CN401411, Respondent was found guilty and convicted on his plea of guilty for violation of Vehicle Code Sections 23153(a) (driving under the influence of alcohol causing injury) and

1 20001(a) (hit and run with injury), both misdemeanors. In addition, Respondent admitted the
2 allegation that in the commission of violation of Vehicle Code Section 23153(a), Respondent had
3 a blood alcohol concentration of 0.15 percent or more, by weight, within the meaning of Vehicle
4 Code Section 23578. The court suspended imposition of sentence and placed Respondent on
5 summary probation for 5 years subject to terms and conditions including by not limited to serving
6 9 days jail time, with credit for 9 days, paying fines, and completing a first conviction program
7 and a MADD program. The court also ordered Respondent to wear a Secure Continuous Remote
8 Alcohol Monitoring System ("SCRAM") ankle bracelet for one year. On or about November 6,
9 2019, the court found Respondent was in violation of probation, reinstated probation, and ordered
10 that Respondent serve 120 days in custody, stayed, pending successful completion of probation on
11 July 8, 2024.

12 4. The conviction, as described in Paragraph 3 above, bears a substantial relationship
13 under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications,
14 functions or duties of a real estate licensee.

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

18 SECOND CAUSE OF ACCUSATION

19 (FAILURE TO REPORT CONVICTION)

20 6. Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, "the
21 conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any
22 felony or misdemeanor" to the Department within thirty (30) days of the conviction. Respondent
23 failed to report in writing to the Department the conviction described in Paragraph 3 above, within
24 thirty (30) days of the conviction date.

25 7. Respondent's failure to timely report the convictions described in Paragraph 3
26 above constitutes cause under Section 10186.2 of the Code for the suspension or revocation of the
27 license and license rights of Respondent under the Real Estate Law.

28 ///

1 COSTS

2 (COSTS OF INVESTIGATION AND ENFORCEMENT)

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

8 WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this
9 Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action
10 against all the licenses and license rights of Respondent JASON TAD KOEHN under the Real
11 Estate Law, for the costs of investigation and enforcement as permitted by law, and for such other
12 and further relief as may be proper under other applicable provisions of law.

13
14 Dated at San Diego, California this 23 day of October, 2020.

15
16
17 
18 Veronica Kilpatrick
19 Supervising Special Investigator

20
21 cc: JASON TAD KOEHN
22 Member Development, Inc.
23 Veronica Kilpatrick
24 Sacto.
25
26
27
28