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FILED

APR 12 2023

DEPT. OF REAL ESTATE

By John Aguilera

9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Application of) No. H-05741 SD
13 JEREMY KRISTIN PLUMMER,) STATEMENT OF ISSUES
14 Respondent.)
15)

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17 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
18 State of California, for Statement of Issues against JEREMY KRISTIN PLUMMER, a.k.a.
19 "Jeremy Plummer" ("Respondent"), is informed and alleges in her official capacity as follows:

20 1.

21 On or about May 13, 2022, Respondent applied to the Department for a
22 salesperson exam/license.

23 CRIMINAL CONVICTION

24 2.

25 On or about May 7, 2018, in the Superior Court of California, County of
26 Riverside, Case No. SWM1801735, Respondent was convicted, on guilty pleas, for violating
27 Vehicle Code section 23152(b) (DUI with .08% BAC or more) and Vehicle Code section

STATEMENT OF ISSUES

20001(a) (hit and run involving injury), both misdemeanors, enhanced by admitting to a high BAC concentration of .15 or more and to a prior DUI conviction. The court suspended proceedings and placed Respondent on forty-eight (48) months of summary probation under certain terms and conditions, including serving 90 days in county jail that was to be served by Work Release Program, complete an 18-month SB 39 Multiple Offender Drinking Driver Program, complete MADD VIP, complete a 1-year treatment program at Center for Life in Temecula, drive with ignition interlock device installed in vehicle for twelve (12) months, and payment of fines, fees and restitution.

3.

The crimes of which Respondent was convicted, as described in Paragraph 2 above, by their facts and circumstances, bear a substantial relationship under Section 2910, Title 10, Chapter 6, of the California Code of Regulations to the qualifications, functions or duties of a real estate licensee.

4.

The crimes of which Respondent was convicted, as described in Paragraph 2 above, constitute cause for denial of Respondent's application for a real estate license under California Business and Professions Code sections 475(a)(2), 480(a)(1) and 10177(b).

IN AGGRAVATION

5.

On or about March 12, 2012, in the Superior Court of California, County of Riverside, Case No. SWM1105193, Respondent was convicted, on a guilty plea, for violating Vehicle Code section 23152(b) (DUI with .08% BAC or more), a misdemeanor, enhanced by admitting to a high BAC concentration of .15 or more pursuant to Vehicle Code section 23578. The court placed Respondent on thirty-six (36) months of summary probation under certain terms and conditions, including serving 35 days in county jail, of which the 33 days were to be completed via LCA's Electronic Monitoring Program, complete AB1353 First Offender Drinking Driver Program, and payment of fines and fees.

6.

These proceedings are brought under the provisions of Section 10100, Division 4 of the Business and Professions Code of the State of California and Sections 11500 through 11528 of the California Government Code.

WHEREFORE, the Complainant prays that the above-entitled matter be set for hearing and, upon proof of the charges contained herein, that the Commissioner refuse to authorize the issuance of, and deny the issuance of, a real estate salesperson license to Respondent JEREMY KIRSTIN PLUMMER and for such other and further relief as may be proper under other applicable provisions of law.

Dated at San Diego, California, on March 8, 2023.

Veronica Kilpatrick

Veronica Kilpatrick
Supervising Special Investigator

cc: JEREMY KRISTIN PLUMMER
Veronica Kilpatrick
Sacto.