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8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

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11 In the Matter of the Accusation of)
12) H-7384 SAC
13 WILLIE E. WILCOX,)
14) ACCUSATION
Respondent.)

15 The Complainant, HEATHER NISHIMURA, a Supervising Special Investigator
16 of the State of California, for cause of Accusation against WILLIE E. WILCOX (Respondent), is
17 informed and alleges as follows:

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19 Complainant makes this Accusation against Respondent in her official capacity.

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21 Respondent is presently licensed and/or has license rights under the Real Estate
22 Law, Part 1 of Division 4 of the California Business and Professions Code (the Code) by the
23 Department of Real Estate (the Department) as a real estate salesperson.

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25 On or about May 17, 2023, in the Superior Court of the State of California,
26 County of Alameda, Case No. 22-CR-009629, Respondent was convicted of violating Section
27 245(a)(4) of the California Penal Code (assault by means likely to produce GBI), a misdemeanor

1 and a crime which bears a substantial relationship under Section 2910, Title 10, California Code
2 of Regulations to the qualifications, functions, or duties of a real estate licensee.

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4 The facts alleged in Paragraph 3, above, constitute cause under Section 490 and
5 Section 10177(b) (conviction of substantially related crime) of the Code, for suspension or
6 revocation of Respondent's license under the Real Estate Law.

7 MATTERS IN AGGRAVATION

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9 On or about December 8, 2009, in the United State District Court, Northern
10 District of California, Case No. CR-09-00789-001 WDB, Respondent was convicted of violating
11 Title 18, Section 1905 (disclosure of confidential information), a misdemeanor.

12 PRIOR ADMINISTRATIVE PROCEEDINGS

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14 Effective July 29, 2016, in Case Number LCB 2095-AP, the Insurance
15 Commissioner denied Respondent's application for an insurance license based on the conviction
16 set forth in Paragraph 4, above.

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18 Section 10106 of the Code provides, in pertinent part, that in any order issued in
19 resolution of a disciplinary proceeding before the department, the commissioner may request the
20 administrative law judge to direct a licensee found to have committed a violation of this part to
21 pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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1 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
2 of this Accusation and that upon proof thereof, a Decision be rendered imposing disciplinary
3 action against all licenses and license rights of Respondent under the Code, for the reasonable
4 costs of investigation and prosecution of this case, including agency attorney's fees and for such
5 other and further relief as may be proper under provisions of law.

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10 HEATHER NISHIMURA

11 Supervising Special Investigator

12 Dated at Sacramento, California

13 this 11th day of Sept. 2024.

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16 DISCOVERY DEMAND

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18 The Department of Real Estate hereby requests discovery pursuant to Section
19 11507.6 of the California Government Code. Failure to provide discovery to the Department
20 may result in the exclusion of witnesses and/or documents at the hearing, and other sanctions as
21 the Administrative Law Judge deems appropriate.