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FILED

DEC 29 2022

DEPARTMENT OF REAL ESTATE

By *L. L. L. L.*

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)

12 LENNART W. PERSSON, JR.,)

13 Respondent.)
14)

No. H-12645 SF

ACCUSATION

15 The Complainant, Stephanie Yee, a Supervising Special Investigator of the State
16 of California, for cause of Accusation against LENNART W. PERSSON, JR. (Respondent), is
17 informed and alleges as follows:

18 1

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

20 2

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

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On or about September 20, 2021, in the Superior Court of the State of California, County of San Joaquin, Case No. CR 2021-000278, Respondent was convicted of violating Section 273(a) of the California Penal Code (inflict corporal injury on spouse/co-habitant), a felony, and Section 422(a) of the California Penal Code (threaten crime w/intent to terrorize), misdemeanor, both crimes which bear a substantial relationship under Section 2910, Title 10, California Code of Regulations, to the qualifications, functions, or duties of a real estate licensee.

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The facts alleged above constitute cause under Section 10177(b) (Further Grounds for Disciplinary Action- Conviction of Crime) and Section 490 (Conviction Substantially Related Crime) of the Code for suspension or revocation of Respondent's license under the Real Estate Law.

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A diligent search was made of the records of the Department of Real Estate (Department), relating to Respondent's Real Estate Salesperson License. As a result of said search, no record was discovered having been received from Respondent notifying the Department, in writing, of any conviction.

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The facts alleged above, in Paragraphs 3 and 5, constitute a violation of Section 10186.2 (failure to report in writing, a conviction within 30 days) of the Code and are grounds for revocation of all licenses and license rights of Respondent under Section 10177(d) of the Code.

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Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, the Commissioner may request the Administrative Law Judge to direct a licensee found to have committed a violation of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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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7 
8 STEPHANIE YEE
9 Supervising Special Investigator

10 Dated at Oakland, California
11 this 14th day of December, 2022.

12 DISCOVERY DEMAND

13 The Department of Real Estate hereby requests discovery pursuant to Section
14 11507.6 of the California Government Code. Failure to provide discovery to the Department
15 may result in the exclusion of witnesses and/or documents at the hearing, and other sanctions
16 as the Administrative Law Judge deems appropriate.