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FILED

JUN 13 2013

DEPARTMENT OF REAL ESTATE

BY: *[Signature]*

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)	No. H-38914 LA
HOWARD WILLIAM WATSON,)	<u>A C C U S A T I O N</u>
Respondent.)	

The Complainant, Veronica Kilpatrick, a Deputy Real Estate Commissioner of the State of California for cause of Accusation against HOWARD WILLIAM WATSON ("Respondent") alleges as follows:

1.

The Complainant, Veronica Kilpatrick, a Deputy Real Estate Commissioner of the State of California, makes this Accusation in her official capacity.

2.

Respondent is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code as a real estate salesperson. Respondent's license expired on August 11, 2012.

1 The Department of Real Estate retains jurisdiction over the
2 license pursuant to California Business and Professions Code
3 Section 10103.

4
5 (CRIMINAL CONVICTIONS)

6 3.

7 On or about February 22, 2010, in the Superior Court
8 of California, County of San Bernardino, in case no. TMB1000043,
9 Respondent was convicted of violating California Vehicle Code
10 Section 23152(b) (driving under the influence of alcohol), a
11 misdemeanor.

12 4.

13 On or about November 16, 2010, in the Superior Court
14 of California, County of Riverside, in case no. INF10001863,
15 Respondent was convicted of violating California Penal Code
16 Section 496(a) (receiving stolen property), a felony. This
17 crime is substantially related to the qualifications, functions,
18 or duties of a real estate licensee under Section 2910, Title
19 10, Chapter 6, California Code of Regulations.

20 5.

21 On or about October 24, 2011, in the Superior Court of
22 California, County of Riverside, in case no. INF1100460,
23 Respondent was convicted of violating two counts of California
24 Penal Code Section 476 (making or passing fictitious bills with
25 intent to defraud), both felonies. These crimes are
26 substantially related to the qualifications, functions, or
27

1 duties of a real estate licensee under Section 2910, Title 10,
2 Chapter 6, California Code of Regulations.

3 6.

4 On or about October 24, 2011, in the Superior Court of
5 California, County of Riverside, in case no. INF1100853,
6 Respondent was convicted of violating California Penal Code
7 Section 211 (second degree robbery), a felony, with the
8 enhancement pursuant to California Penal Code Section
9 12022(b)(1) (using a deadly or dangerous weapon in the
10 commission of a felony). This crime is substantially related to
11 the qualifications, functions, or duties of a real estate
12 licensee under Section 2910, Title 10, Chapter 6, California
13 Code of Regulations.

14 7.

15 The crimes of which Respondent was convicted, as
16 described above, constitute cause under California Business and
17 Professions Code Sections 490 and 10177(b) for the suspension or
18 revocation of the license and license rights of Respondent under
19 the Real Estate Law.

20 California Business and Professions Code Section 10106
21 provides, in pertinent part, that in any order issued in
22 resolution of a disciplinary proceeding before the department,
23 the Commissioner may request the administrative law judge to
24 direct a licensee found to have committed a violation of this
25 part to pay a sum not to exceed the reasonable costs of
26 investigation and enforcement of the case.

27

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all licenses and/or license rights under the Real Estate Law (Part 1 of Division 4 of the California Business and Professions Code) of Respondent HOWARD WILLIAM WATSON for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under applicable provisions of law.

Dated at Los Angeles, California: July 3, 2013.


Veronica Kilpatrick
Deputy Real Estate Commissioner

cc: HOWARD WILLIAM WATSON
Veronica Kilpatrick
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