

FILED

JAN 18 2017

BUREAU OF REAL ESTATE

By A. Delois

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BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of	)	No.H-40516 LA
	)	
HENRY NELSON,	)	<u>ACCUSATION</u>
	)	
Respondent.	)	
	)	

The Complainant, Veronica Kilpatrick, a Supervising
Special Investigator of the State of California, for cause of
accusation against HENRY NELSON, alleges as follows:

1. The Complainant, Veronica Kilpatrick, a Supervising
Special Investigator of the State of California, makes this
Accusation in her official capacity.

2. HENRY NELSON (hereinafter referred to as
"Respondent") is presently licensed and/or has license rights
under the Real Estate Law (Part 1 of Division 4 of the Business
and Professions Code, hereinafter referred to as the "Code").

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1 3. Respondent was licensed by the Bureau of Real
2 Estate of the State of California as a real estate broker
3 effective July 23, 2007. The license expired July 22, 2015.
4 There is a two year renewal right.

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6 4. On or about December 23, 2015, in the County of Los
7 Angeles, Superior Court of California, case No. 5PY06370,
8 Respondent was convicted of violating Penal Code section 242
9 (battery).

10 5. On or about December 23, 2015, in the County of Los
11 Angeles, Superior Court of California, case No. 5PY06068,
12 Respondent was convicted of violating Penal Code section
13 166(A)(4) (contempt of court).

14 6. On or about December 14, 2015, in the County of Los
15 Angeles, Superior Court of California, case No. 5PY04867,
16 Respondent was convicted of violating Penal Code section 484(A) -
17 490.2(A) (petty theft).

18 7. On or about March 12, 2015, in the County of Los
19 Angeles, Superior Court of California, case No. 5WA00232,
20 Respondent was convicted of violating Vehicle Code section
21 23152(B) (driving under the influence).
22

23 8. The above referenced matters bear a substantial
24 relationship to the qualifications, functions, or duties of a
25 real estate licensee, Title 10, Chapter 6, Section 2910,
26 California Administrative Code.
27

1 9. Respondent's convictions alleged in Paragraphs 4
2 through 7 are cause under Code Sections 490 and 10177(b) for
3 suspension or revocation of all licenses and license rights of
4 Respondent under the Real Estate Law.

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

12 WHEREFORE, Complainant prays that a hearing be
13 conducted on the allegations of this Accusation and that upon
14 proof thereof, a decision be rendered imposing disciplinary
15 action on the license and license rights of Respondent HENRY
16 NELSON, for the cost of investigation and enforcement as
17 permitted by law, under the Real Estate Law (Part 1 of Division 4
18 of the Business and Professions Code) and for such other and
19 further relief as may be proper under other applicable provisions
20 of law.
21

22 Dated at San Diego, California,

23 this 13 day of January, 2017.

24 
25 VERONICA KILPATRICK
26 Supervising Special Investigator

27 cc: Henry Nelson
Veronica Kilpatrick
Sacto.