

FILED

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DEPT. OF REAL ESTATE  
By Cal Selorio

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7  
8 BEFORE THE DEPARTMENT OF REAL ESTATE  
9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Application of ) No. H-41225 LA  
12 LEIGHANNE KEYES, ) STATEMENT OF ISSUES  
13 )  
14 Respondent. )

15  
16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the  
17 State of California, acting in her official capacity, for Statement of Issues against LEIGHANNE  
18 KEYES aka Leigh Anne Peters (“Respondent”) alleges as follows:

19 1.

20 On or about May 31, 2017, Respondent made application to the Department of  
21 Real Estate of the State of California for a real estate salesperson license.

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1 misdemeanor. Said crimes bear a substantial relationship to the qualifications, functions, or  
2 duties of a real estate licensee under Section 2910, Title 10, Chapter 6, California Code of  
3 Regulations.

4 6.

5 On or about January 25, 2001, in the Superior Court of California, County of  
6 Riverside, case no. RIM386233, Respondent was convicted of violating California Health and  
7 Safety Code section 11550(a) (under the influence of a controlled substance), a misdemeanor.  
8 Said crime bears a substantial relationship to the qualifications, functions, or duties of a real  
9 estate licensee under Section 2910, Title 10, Chapter 6, California Code of Regulations.

10 7.

11 On or about January 25, 2001, in the Superior Court of California, County of  
12 Riverside, case no. RIM404493, Respondent was convicted of violating California Penal Code  
13 section 459 (burglary), a misdemeanor. Said crime bears a substantial relationship to the  
14 qualifications, functions, or duties of a real estate licensee under Section 2910, Title 10,  
15 Chapter 6, California Code of Regulations.

16 8.

17 On or about November 8, 2001, in the Superior Court of California, County of  
18 Riverside, case no. RIF100002, Respondent was convicted of violating California Penal Code  
19 section 459 (burglary), a felony. In part, Respondent was sentenced to serve 1 year and 4  
20 months in state prison. Said crime bears a substantial relationship to the qualifications,  
21 functions, or duties of a real estate licensee under Section 2910, Title 10, Chapter 6, California  
22 Code of Regulations.

23 9.

24 On or about June 24, 2002, in the United States District Court, Central District  
25 of California, case no. ED CR 01-103-RT, Respondent was convicted of violating 18 U.S.C.  
26 1708 (possession of stolen mail), 18 U.S.C. 1344 (bank fraud), and 18 U.S.C. 371 (conspiracy),  
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1 all felonies. In part, Respondent was sentenced to pay \$4,483.65 in restitution. Said crimes  
2 bear a substantial relationship to the qualifications, functions, or duties of a real estate licensee  
3 under Section 2910, Title 10, Chapter 6, California Code of Regulations.

4 10.

5 On or about December 6, 2007, in the Superior Court of California, County of  
6 San Bernardino, case no. FSB700915, Respondent was convicted of violating California Penal  
7 Code sections 459 (burglary), 475 (forgery), and 484 (theft), all felonies. In part, Respondent  
8 was sentenced to serve a total term of 3 years and 4 months of state prison. Said crime bears a  
9 substantial relationship to the qualifications, functions, or duties of a real estate licensee under  
10 Section 2910, Title 10, Chapter 6, California Code of Regulations.

11 11.

12 The crimes of which Respondent was convicted as alleged in Paragraphs 2  
13 through 10, above, constitute cause for denial of Respondent's application for a real estate  
14 license under California Business and Professions Code sections 475(a)(2), 480(a), and  
15 10177(b).

16  
17 SECOND CAUSE OF ACTION  
18 (FAILURE TO REVEAL CONVICTIONS)

19 12.

20 In response to Question 23 of her license application, to wit: "HAVE YOU  
21 EVER BEEN CONVICTED (SEE PARAGRAPH ABOVE) OF ANY VIOLATION OF THE  
22 LAW AT THE MISDEMEANOR OR FELONY LEVEL? IF YES, COMPLETE ITEM 29  
23 WITH INFORMATION ON EACH CONVICTION," Respondent answered, "Yes," but failed  
24 to reveal the convictions described in Paragraphs 2 through 7 and Paragraph 9, above.

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13.

Respondent's failure to reveal these convictions in her license application constitutes knowingly making a false statement of material facts required to be revealed in said application, which is grounds for denial of the issuance of a license under California Business and Professions Code sections 475(a)(1), 480(d), and 10177(a).

14.

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 LEIGHANNE KEYES and for such other and further relief as may be proper under other applicable provisions of law.

Dated at San Diego, California: November 9, 2018.

V. Kilpatrick  
Veronica Kilpatrick  
Supervising Special Investigator

cc: LEIGHANNE KEYES  
Veronica Kilpatrick  
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