

1 Julie L. To, Counsel (SBN 219482)
2 Department of Real Estate
3 320 West 4th Street, Suite 350
4 Los Angeles, California 90013
Telephone: (213) 576-6982
(Direct) (213) 576-6916

FILED

JAN 25 2019

DEPT. OF REAL ESTATE

By: [Signature]

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6
7 BEFORE THE DEPARTMENT OF REAL ESTATE
8 STATE OF CALIFORNIA
9

10 In the Matter of the Accusation of) No. H-41278 LA
11)
12 LEON DEVORE JACKSON,) ACCUSATION
13)
Respondent.)

14
15 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
16 State of California, for cause of Accusation against LEON DEVORE JACKSON a.k.a. Leon
17 Jackson ("Respondent") alleges as follows:

18 1.

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

21 2.

22 A. Respondent is presently licensed and/or has license rights under the Real
23 Estate Law, Part 1 of Division 4 of the California Business and Professions Code ("Code") as a
24 real estate broker ("REB") Department of Real Estate ("Department" or "DRE") license ID
25 01345294.
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DRE Accusation - LEON DEVORE JACKSON

1 B. Respondent was first issued a REB license by the DRE on or about July 29,
2 2002.

3 C. Respondent's REB license will expire on July 28, 2022.

4 FIRST CAUSE FOR DISCIPLINE

5 (CRIMINAL CONVICTION)

6 3.

7 October 13, 2017: Penal Code Section 245(a)(1)- Misdemeanor

8 A. On or about October 13, 2016, in the Superior Court of California, County of
9 Los Angeles, in Case No. BA445921, The People of the State of California vs. Leon Jackson,
10 Respondent pled *nolo contendere* to and was found guilty by the court for violation of Penal
11 ("PC") Section 245(a)(1) (assault with a deadly weapon) (Count One), a felony. The court
12 ordered Respondent to perform thirty (30) days of community service and to complete a one-
13 year anger management program, and set October 13, 2017 as the date of sentencing.

14 B. On or about October 13, 2017, the court ordered that the Information be
15 amended to allege Count One as a misdemeanor, pursuant to PC 17B. Also on October 13,
16 2017, Respondent was convicted and sentenced to 24 months summary probation, two (2) days
17 in Los Angeles County Jail, and ordered to pay court fees and fines. In addition, Respondent
18 was ordered to perform 30 days community service and complete a one-year anger
19 management program.

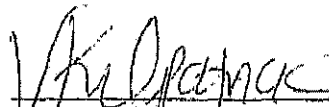
20 4.

21 The crime of which Respondent was convicted, by its facts and circumstances,
22 bears a substantial relationship under Section 2910, Title 10, Chapter 6, California Code of
23 Regulations to the qualifications, functions or duties of a real estate licensee and constitute
24 cause under **Code Sections 490 and 10177(b)** for the suspension or revocation of the license
25 and license rights of Respondent under the Real Estate Law.

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

7 Dated at San Diego, California

8 this 17 day of January, 2019.
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11 
12 Veronica Kilpatrick
13 Supervising Special Investigator
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15 cc: LEON DEVORE JACKSON
16 Veronica Kilpatrick
17 Sacto.
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