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**FILED**  
SEP 19 2019  
DEPT. OF REAL ESTATE  
By 

10 BEFORE THE DEPARTMENT OF REAL ESTATE  
11 STATE OF CALIFORNIA

12 \* \* \*

13 In the Matter of the Application of ) No. H-41500 LA  
14 LEON GILMORE JR, ) STATEMENT OF ISSUES  
15 Respondent. )  
16 \_\_\_\_\_ )

17 The Complainant, Maria Suarez, a Supervising Special Investigator of the State  
18 of California, for Statement of Issues against LEON GILMORE JR (“Respondent”), is  
19 informed and alleges in her official capacity as follows:

20 1.

21 On or about June 7, 2017, Respondent made application to the Department of  
22 Real Estate (“Department”) of the State of California for a real estate salesperson license.

23 2.

24 All references to the “Code” are to the Real Estate Law, Part 1 of Division 4 of  
25 the California Business and Professions Code.

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(LICENSE HISTORY)

3.

a. On or about April 11, 2002, the Department issued Respondent a conditional salesperson license (license ID 01315478).

b. On or about October 12, 2003, Respondent's conditional salesperson license was suspended for failing to file the education requirements pursuant to Code section 10153.4.

c. On or about December 5, 2003, Respondent's license was also subject to suspension pursuant to California Family Code section 17520 for failing to make child support payments. On or about March 23, 2010, this suspension for child support payments was released, while the suspension for education requirements remained.

d. On or about October 12, 2007, Respondent's license rights expired.

(CRIMINAL CONVICTION)

4.

On or about November 10, 2004, in the United States District Court, Northern District of Ohio, Case Number 1:03CR308-009, Respondent was convicted on his plea of guilty for violation of Title 21 of the United States Code sections 846, 841(a)(1) and (b)(1)(A) (conspiracy to possess with the intent to distribute cocaine), a felony. The court sentenced Respondent to serve eighty (80) months in prison, and upon release from imprisonment, be placed on supervised release for five (5) years.

5.

The crime of which Respondent was convicted as described in Paragraph 4 above, by its facts and circumstances, bears a substantial relationship under Section 2910, Title 10, Chapter 6, of the California Code of Regulations to the qualifications, functions or duties of a real estate licensee.

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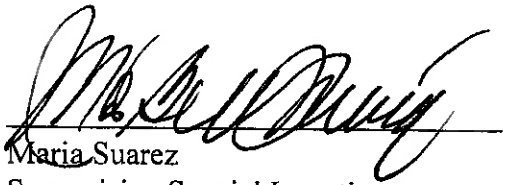
The crime of which Respondent was convicted, as described in Paragraph 4 above, constitutes cause for denial of Respondent's application for a real estate license under California Business and Professions Code sections 480(a)(1) and 10177(b).

7.

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 LEON GILMORE JR and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California this 10th day of September, 2019.

  
\_\_\_\_\_  
Maria Suarez  
Supervising Special Investigator

cc: LEON GILMORE JR  
Maria Suarez  
Sacto.