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FILED

JUL 01 2022

DEPT. OF REAL ESTATE
By E. Martinez

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)	No. H-42268 LA
)	
XIAO LI,)	<u>A C C U S A T I O N</u>
)	
Respondent.)	
_____)	

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for cause of Accusation against XIAO LI ("Respondent"), is informed and alleges as follows:

1.

The Complainant, Veronica Kilpatrick, acting in her official capacity as a Supervising Special Investigator of the State of California, makes this Accusation against XIAO LI.

2.

Respondent presently has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code ("Code"), as a real estate salesperson.

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Accusation of Xiao Li

1 FIRST CAUSE OF ACTION
2 (CRIMINAL CONVICTIONS)

3 3.

4 On or about December 2, 2019, Respondent pled nolo contendere and was
5 convicted in the Superior Court of California, County of Los Angeles, Case No. 9WC00458,
6 for violation of California Penal Code section 243(e)(1) (Battery), a misdemeanor. Respondent
7 was placed on three years of summary probation, and ordered to serve one day in jail and pay
8 fines and fees. Additionally, Respondent was ordered to perform five days of community labor,
9 complete a 52-week domestic violence treatment program, and stay 100 yards away from the
10 victim.

11 4.

12 On or about January 8, 2020, Respondent pled nolo contendere and was
13 convicted in the Superior Court of California, County of Los Angeles, Case No. 9AM02212, for
14 violation of California Penal Code section 242 (Battery), a misdemeanor. Respondent was
15 placed on 13 months of summary probation, and ordered to pay fines and fees. Additionally,
16 Respondent was ordered to perform five days of community labor, and complete a 52-week
17 domestic violence treatment program.

18 5.

19 The convictions described in Paragraphs 3 and 4 bear a substantial relationship
20 under section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications,
21 functions or duties of a real estate licensee.

22 6.

23 The crimes of which Respondent was convicted, as described in Paragraphs 3
24 and 4 above, constitutes cause under sections 490 and 10177(b)(1) of the Code for the
25 suspension or revocation of all the licenses and license rights of Respondent under the Real
26 Estate Law.

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SECOND CAUSE OF ACTION
(FAILURE TO REPORT CONVICTIONS)

7.

Pursuant to Code section 10186.2, a licensee shall report, in writing, “the conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any felony or misdemeanor” to the Department of Real Estate (“Department”) within 30 days of the conviction. Respondent failed to report in writing to the Department the convictions described in Paragraphs 3 and 4 above, within thirty (30) days of the conviction dates (December 2, 2019 and January 8, 2020 respectively). Respondent’s failure to timely report the convictions constitutes cause under section 10186.2 of the Code for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

8.

Code section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department of Real Estate, the Commissioner may request the administrative law judge to direct a licensee found to have committed a violation of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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Accusation of Xiao Li

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 the licenses, license endorsements, and license rights of
4 Respondent XIAO LI under the Real Estate Law, for the cost of investigation and enforcement
5 as permitted by law, and for such other and further relief as may be proper under other
6 applicable provisions of law.

7
8 Dated at San Diego, California

9 this 30th day of June, 2022

10
11 Veronica Kilpatrick

12 Veronica Kilpatrick
13 Supervising Special Investigator

14
15 cc: XIAO LI
16 Heyday Investment Inc DBA Socal Premier Properties
17 Veronica Kilpatrick
18 Sacto.
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