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FILED

DEC - 7 2022

DEPT. OF REAL ESTATE

By *al silva*

10 BEFORE THE DEPARTMENT OF REAL ESTATE
11 STATE OF CALIFORNIA

12 * * *

13 In the Matter of the Application of) No. H-42454 LA
14)
15 LINDA LEXION WASHINGTON,) STATEMENT OF ISSUES
16)
17 Respondent.)

18 The Complainant, Jason Parson, a Supervising Special Investigator of the State
19 of California, for Statement of Issues against LINDA LEXION WASHINGTON, also known as
20 Linda Francesay Washington, Linda Francesay Lexion, Linda Washington, Linda Dawson,
21 Linda Knox, Cheryl Knox, Linda Oliphant, Linda Francesay, Linda F. Washington, Georgetta
22 Webb, Linda Francesay Dawson, Linda F. Lexion, Linda Francesay, Linda Francesay Oliphant,
23 Linda Lexion, Linda Francesay Knox, Linda Washington Francesay, Linda Washington
24 Dawson, Linda Washington Lexion, Linda Hattie Washington, Kathy Marshall, Linda Marshall,
25 and Donna Washington ("Respondent"), is informed and alleges in his official capacity as
26 follows:
27

STATEMENT OF ISSUES

1. 1

2 On or about June 4, 2021, Respondent made application to the Department of
3 Real Estate ("Department") of the State of California for a real estate salesperson license.

4 (CRIMINAL CONVICTIONS)

5 2.

6 On or about November 15, 1977, in the Superior Court of California, County of
7 San Bernardino, Case No. CR34237, Respondent was convicted on a plea of guilty for violation
8 of Penal Code section 459 (burglary), a felony. Respondent was placed on supervised probation
9 for two (2) years, on certain terms and conditions.

10 3.

11 On or about May 1, 1989, in the Superior Court of California, County of San
12 Bernardino, Case No. SCR46971, Respondent was convicted on a plea of guilty for violation of
13 Penal Code section 459 (burglary), and Penal Code section 470 (forgery), both felonies.
14 Respondent was ordered to serve two (2) years in state prison.

15 4.

16 On or about January 5, 2000, in the Superior Court of California, County of
17 Riverside, Case No. RIF086947, Respondent was convicted on a plea of guilty for violation of
18 Penal Code section 666 (petty theft with a prior), a felony. Respondent was placed on formal
19 probation for thirty-six (36) months, on certain terms and conditions, including, in part,
20 commitment of the custody of the Riverside Sheriff's Office for one hundred fifty (150) days,
21 with credit for time served of two (2) actual days, and payment of fines and fees.

22 5.

23 On or about November 16, 2004, in the Superior Court of California, County of
24 San Bernardino, Case No. FWV032539, Respondent was convicted on a plea of guilty for
25 violation of Penal Code section 496(a) (knowingly receiving stolen property), a felony. On or
26 about January 7, 2005, Respondent was sentenced. Respondent was placed on formal probation
27 for forty-eight months, on certain terms and conditions, including, in part, serving three

1 hundred sixty-five (365) days in a San Bernardino County Jail Facility, with credit for time
2 served of two hundred thirty (230) days, staying away from all Robinsons-May Department
3 Stores, and payment of fines and fees.

4 6.

5 On or about July 15, 2011, in the Superior Court of California, County of
6 Riverside, Case No. RIF146075, Respondent was convicted on a plea of guilty for violation of
7 Penal Code section 530.5(a) (identity theft), a felony. Respondent was placed on formal
8 probation for thirty-six (36) months, on certain terms and conditions, including, in part,
9 commitment of the custody of the Riverside Sheriff's Office for one hundred twenty (120) days,
10 with one hundred (100) days to be served in the Work Release Program. Respondent was given
11 credit for time served of ten (10) actual days and ten (10) days pursuant to Penal Code section
12 4019. Respondent was also ordered to pay fines and fees.

13 7.

14 On or about July 15, 2011, in the Superior Court of California, County of
15 Riverside, Case No. RIF149988, Respondent was convicted on a plea of guilty for violation of
16 Vehicle Code section 10851(a) (driving or taking a vehicle without consent), and three
17 violations of Penal Code section 470(b) (possession of a fake driver's license or ID card), all
18 felonies. Respondent was placed on formal probation for thirty-six months, on certain terms and
19 conditions, including, in part, commitment of the custody of the Riverside Sheriff's Office for
20 one hundred twenty (120) days, with one hundred seven (107) days to be served in the Work
21 Release Program. Respondent was given credit for time served of seven (7) actual days and six
22 (6) days pursuant to Penal Code section 4019, to be served concurrently with Case No.
23 RIF146075. Respondent was also ordered to pay fines and fees.

24 8.

25 The crimes of which Respondent was convicted, as described in Paragraphs 2
26 through 7 above, by their facts and circumstances, bear a substantial relationship under Section
27

1 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications, functions or
2 duties of a real estate licensee.

3 9.

4 The crimes of which Respondent was convicted, as described in Paragraphs 2
5 through 7 above, constitute cause for denial of Respondent's application for a real estate license
6 under California Business and Professions Code sections 480(a)(1) and 10177(b).

7 10.

8 These proceedings are brought under the provisions of Section 10100, Division
9 4 of the Business and Professions Code of the State of California and Sections 11500 through
10 11528 of the California Government Code.

11 * * *

12 WHEREFORE, the Complainant prays that the above-entitled matter be set for
13 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
14 authorize the issuance of, and deny the issuance of, a real estate salesperson license to
15 Respondent LINDA LEXION WASHINGTON and for such other and further relief as may be
16 proper under other applicable provisions of law.

17
18 Dated at Los Angeles, California this 29th day of November, 2022.

19
20
21 
22 Jason Parson
23 Supervising Special Investigator
24

25
26 cc: LINDA LEXION WASHINGTON
27 Jason Parson
Sacto.

STATEMENT OF ISSUES