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**FILED**  
MAY 05 2026  
DEPT. OF REAL ESTATE  
By 

9 BEFORE THE DEPARTMENT OF REAL ESTATE  
10 STATE OF CALIFORNIA

11 \* \* \*

12 In the Matter of the Accusation of  
13 NOAH ZION ROBINSON,  
14 Respondent.

No. H-43272-LA  
ACCUSATION

15 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator for the  
16 Department of Real Estate (“Department” or “DRE”) of the State of California, for cause of  
17 Accusation against NOAH ZION ROBINSON (“Respondent”), is informed and alleges in her  
18 official capacity as follows:

19 1. The Complainant, Veronica Kilpatrick, acting in her official capacity as a  
20 Supervising Special Investigator, makes this Accusation against Respondent.

21 LICENSE HISTORY

22 2. Respondent has been licensed by the DRE as a real estate salesperson (“RES”), DRE  
23 license identification number 02239945, from on or about February 21, 2025, through the present,  
24 with Respondent’s license scheduled to expire on or about February 20, 2029, unless renewed.

25 FIRST CAUSE OF ACCUSATION

26 (CRIMINAL CONVICTION)

27 3. On or about July 3, 2025, in the California Superior Court for Riverside County, in  
28 the case of *The People of the State of California v. Noah Zion Robinson, et al.*, Case No.  
FESW2501360-1 (“Case No. FESW2501360-1”), a Felony Complaint was filed against Respondent

1 and another defendant, Carter William Proulx (“Proulx”), alleging the following counts against  
2 Respondent:

3 a. Respondent and Proulx violated California Penal Code section 459 (burglary  
4 (Count 1)), a felony;

5 b. Respondent and Proulx violated California Penal Code section 245(a)(4)  
6 (assault on T.K., by means of force likely to produce great bodily injury (Count 2)), a felony;

7 c. Respondent and Proulx violated California Penal Code section 182(a)(1)  
8 (conspiracy to commit assault likely to cause great bodily injury or death in violation of  
9 Penal Code section 245(a)(4) (Count 3), committing the following eight (8) overt acts:  
10 arriving at the residence together; forcing themselves into the apartment; pushing the  
11 resident aside to get through the front door; going upstairs to find T.K.; physically attacking  
12 T.K. at the same time; Proulx holding T.K. while Respondent punched T.K; leaving the  
13 apartment together; and getting into the same car and fleeing the scene together), a felony;  
14 and

15 d. Respondent violated California Penal Code section 243(e)(1) (battery upon  
16 E.E., a spouse or person with whom Respondent is cohabitating), a misdemeanor.

17 4. On or about October 28, 2025, in Case No. FESW2501360-1, Respondent was  
18 convicted based on his guilty plea to violating of Penal Code section 245(a)(4) (assault on T.K., by  
19 means of force likely to produce great bodily injury (Count 2)), a felony, and Penal Code section  
20 243(e)(1) (battery upon E.E., a spouse or person with whom Respondent is cohabitating), a  
21 misdemeanor.

22 a. The court sentenced Respondent to serve a term of three (3) years in state  
23 prison on Count 2, and to serve an additional 90 days jail time on Count 4. The court then  
24 suspended proceedings and placed Respondent on formal probation for 36 months, subject  
25 to terms and conditions including but not limited to: obeying all laws; serving 90 days jail  
26 time, with credit for four (4) days, with 86 days to be served in the Work Release Program;  
27 paying fees, a restitution fine, and victim restitution; complete a probation-approved 52-

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1 week Domestic Violence Program; do not have any direct or indirect contact with E.E. or  
2 T.K.; obeying the Criminal Protective Order -Domestic Violence; and performing 20 hours  
3 of community service.

4 b. The court dismissed Counts 1 and 3 against Respondent.

5 5. Complainant alleges in aggravation for purposes of this First Cause of Accusation  
6 only, and does not allege in aggravation for purposes of the Second Cause of Accusation, that, on  
7 or about December 11, 2025, in the California Superior Court for Riverside County, in the case of  
8 *The People of the State of California v. Noah Zion Robinson*, Case No. SWM2406669 (“Case No.  
9 SWM2406669”), Respondent was convicted based on his guilty plea to violating California Vehicle  
10 Code section 23152(b) (driving while having blood alcohol of 0.08% and more), a misdemeanor.  
11 The court suspended imposition of sentence and placed Respondent on summary probation for 36  
12 months subject to terms and conditions including but not limited to: obeying all laws; serving 12  
13 days jail time, with 11 days to be served in the Work Release Program; serving custody on weekends  
14 in lieu of paying a DUI fine; paying a fees and a restitution fine; completing a three-month first  
15 offender impaired driver program; and attending 10 AA meetings.

16 6. The conviction, as described in Paragraph 4 above, bears a substantial relationship  
17 under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications,  
18 functions, or duties of a real estate licensee.

19 7. The crime for which Respondent was convicted, as described in Paragraph 4 above,  
20 constitutes cause under California Business and Professions Code (“Code”) sections 490 and  
21 10177(b) for the suspension or revocation of the license and license rights of Respondent under the  
22 Real Estate Law.

23 SECOND CAUSE OF ACCUSATION

24 (FAILURE TO REPORT FELONY CHARGES AND CONVICTION)

25 8. Complainant realleges and incorporates by reference all of the allegations contained  
26 in the previous paragraphs as though fully set forth herein.

27 9. Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, “The  
28 bringing of a criminal complaint, information, or indictment charging a felony against the licensee,”

1 and “The conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest,  
2 of any felony or misdemeanor” to the DRE within thirty (30) days of the date of the charging of a  
3 felony and of the conviction.

4 10. On dates that Respondent was licensed by the DRE as a RES, Respondent failed to  
5 report the following in writing to the DRE within 30 days of:

6 a. The bringing of a criminal complaint on or about July 3, 2025, charging  
7 Respondent with felonies in Case No. FESW2501360-1, as described in Paragraph 3 above;

8 b. Respondent’s conviction on or about October 28, 2025, in Case No.  
9 FESW2501360-1, as described in Paragraph 4 above; and

10 c. Respondent’s conviction on or about December 11, 2025, in Case No.  
11 SWM2406669, as described in Paragraph 5 above.

12 11. Respondent’s failures to timely report the bringing of a criminal complaint charging  
13 him with felonies in Case No. FESW2501360-1, and his failure to timely report his convictions in  
14 Case Nos. Case No. FESW2501360-1 and SWM2406669, violate Code section 10186.2 and  
15 constitute cause under Code sections 10186.2 and 10177(d) and/or 10177(g) for the suspension or  
16 revocation of the license and license rights of Respondent under the Real Estate Law.

17 COSTS

18 (COSTS OF INVESTIGATION AND ENFORCEMENT)

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

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1           WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this  
2 Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against  
3 all the licenses and license rights of Respondent NOAH ZION ROBINSON under the Real Estate  
4 Law, for the costs of investigation and enforcement as permitted by law, and for such other and  
5 further relief as may be proper under other applicable provisions of law.

6 Dated at San Diego, California May 4, 2026.



Veronica Kilpatrick  
Supervising Special Investigator

11 cc: NOAH ZION ROBINSON  
12 TR Real Estate Services Inc  
13 Veronica Kilpatrick  
14 Sacto.

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