

FILED

JUN 07 2023

DEPT. OF REAL ESTATE
By 

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

10 * * *

11 In the Matter of the Accusation of) No. H-05759 SD
12)
13 JASON WADE HUGHES,) A C C U S A T I O N
14)
15 Respondent.)
16 _____)

17 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
18 State of California for cause of Accusation against JASON WADE HUGHES (“Respondent”)
19 alleges as follows:

20 1.

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

23 2.

24 Respondent is presently licensed and/or has license rights under the Real Estate
25 Law, Part 1 of Division 4 of the California Business and Professions Code as a real estate
26 broker (license no. 01008564). Respondent was originally licensed as a real estate broker on or
27 about October 4, 1994. From on or about November 21, 1988 to October 3, 1994, Respondent
was licensed as a real estate salesperson.

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1 (CRIMINAL CONVICTION)

2 3.

3 On or about March 23, 2023, in the Superior Court of California, County of San
4 Diego, case no. M095390, Respondent was convicted of violating California Government Code
5 section 1090 (conflict of interest), a misdemeanor. In part, Respondent was sentenced to serve
6 one (1) year of summary probation and pay \$9,433,872.30 in restitution, which was fully paid
7 at sentencing. The underlying facts include, but are not limited to, Respondent, an appointed
8 city advisor, participating in the making of a contract with the City of San Diego in which he
9 personally profited. This crime is substantially related to the qualifications, functions, or duties
10 of a real estate licensee under Section 2910, Title 10, Chapter 6, California Code of
11 Regulations.

12 4.

13 The crime of which Respondent was convicted, as described in Paragraph 3,
14 above, constitutes cause under California Business and Professions Code sections 490 and
15 10177(b) for the suspension or revocation of the license and license rights of Respondent under
16 the Real Estate Law.

17 5.

18 These proceedings are brought under the provisions of Section 10100, Division
19 4 of the Business and Professions Code of the State of California and Sections 11500 through
20 11528 of the California Government Code.

21 (COSTS)

22 6.

23 California Business and Professions Code section 10106 provides, in pertinent
24 part, that in any order issued in resolution of a disciplinary proceeding before the department,
25 the Commissioner may request the administrative law judge to direct a licensee found to have
26

1 committed a violation of this part to pay a sum not to exceed the reasonable costs of
2 investigation and enforcement of the case.

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

9 Dated at San Diego, California: June 5, 2023

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Veronica Kilpatrick

Veronica Kilpatrick
Supervising Special Investigator

cc: JASON WADE HUGHES
Veronica Kilpatrick
Sacto.