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FILED
SEP 07 2022
DEPT. OF REAL ESTATE
By 

8
9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Application of) No. H-42352 LA
13)
14 CRYSTAL GUERRERO,) STATEMENT OF ISSUES
15)
16 Respondent.)
_____)

17 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
18 of California, for Statement of Issues against CRYSTAL GUERRERO (“Respondent”) alleges
19 as follows:

20 1.

21 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
22 of California, makes this Statement of Issues in her official capacity.

23 2.

24 All references to the “Code” are to the California Business and Professions Code
25 and all references to “Regulations” are to Title 10, Chapter 6, California Code of Regulations.

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3.

On or about April 23, 2021, Respondent made application to the Department of Real Estate¹ ("Department") for a real estate salesperson license.

CAUSE FOR DISCIPLINE

(CRIMINAL CONVICTION)

4.

May 9, 2019; Penal Code ("PC") Sections 243(e)(1) and 381b - Misdemeanors

a. On or about May 9, 2019, in the Superior Court of California, Los Angeles County, in Case No. **9BL02302**, The People of the State of California v. Crystal Guerrero, Respondent pled no contest to and was convicted of violation of PC Section 243(e)(1) (battery on a spouse/child's parent), a misdemeanor, and PC Section 381b (possession of nitrous oxide), a misdemeanor.

b. Also, on or about May 9, 2019, the Court suspended the imposition of sentence and placed Respondent on summary probation for 36 months under certain terms and conditions, including, in part, 2 days jail, enroll and complete 52 domestic violence classes, payment of restitution, and payment of fines and fees.

(AGGRAVATING FACTORS)

5.

April 3, 2014; PC Section 21810 - Misdemeanor

a. On or about April 3, 2014, in the Superior Court of California, Los Angeles County, in Case No. **2SY04877**, The People of the State of California v. Crystal Guerrero, Respondent pled no contest to and was convicted of violation of PC Section 21810 (manufacture, sale. . . possession of metal knuckles), a misdemeanor.

b. Also, on or about April 3, 2014, the Court suspended the imposition of sentence and placed Respondent on summary probation for 36 months under certain terms and

¹ Between July 1, 2013 and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate under the Department of Consumer Affairs.

1 conditions, including, in part, 106 hours of community service (in lieu of fines) and payment of
2 fines and fees.

3 6.

4 The crimes of which Respondent were convicted, as set forth in Paragraph 4
5 above, by their facts and circumstances, bear a substantial relationship under Section 2910,
6 Title 10, Chapter 6, California Code of Regulations to the qualifications, functions or duties of a
7 real estate licensee.

8 7.

9 The crimes of which Respondent were convicted, as set forth in Paragraph 4
10 above, by their facts and circumstances, constitute cause under **Code Sections 480, 490 and**
11 **10177(b)** for the denial of Respondent's application for a real estate license under the Real
12 Estate Law.

13 8.

14 These proceedings are brought under the provisions of Section 10100, Division
15 4 of the Business and Professions Code of the State of California and Sections 11500 through
16 11528 of the California Government Code.

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P R A Y E R

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 CRYSTAL GUERRERO and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California this 7th day of September, 2022.

Maria Suarez

Maria Suarez
Supervising Special Investigator

cc: CRYSTAL GUERRERO
Maria Suarez
Sacto.