1 2 3 4 5	JASON D. LAZARK, Counsel State Bar No. 263714 Department of Real Estate P.O. Box 137007 Sacramento, CA 95813-7007 Telephone: (916) 576-8700 (916) 576-7843 (Direct) E-mail: jason.lazark@dre.ca.gov
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8	BEFORE THE DEPARTMENT OF REAL ESTATE
9	STATE OF CALIFORNIA
10	* * *
11	In the Matter of the Application of: No. H-3465 FR
12	CHRISTOPHER JOHN BILBO, STATEMENT OF ISSUES
13	Respondent.
14	The Complainant, BRENDA SMITH, acting in her official capacity as a
15	Supervising Special Investigator of the State of California, for Statement of Issues against
16	CHRISTOPHER JOHN BILBO (herein "Respondent"), is informed and alleges as follows:
17	1.
18	On or about May 10, 2021, Respondent made application to the Department of
19	Real Estate of the State of California for a real estate salesperson license.
20	CRIMINAL CONVICTIONS
21	2.
22	On or about August 31, 2009, in the Superior Court of the State of California,
23	County of Fresno, Case Number F09900808, Respondent was convicted of violating Section
24	459/460(a) of the Penal Code (first degree burglary), a felony which bears a substantial
25	relationship under Section 2910, title 10, California Code of the Regulations (herein "the
26	Regulations") to the qualifications, functions or duties of a real estate licensee.
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On or about August 31, 2009, in the Superior Court of the State of California, County of Fresno, Case Number M08925554, Respondent was convicted of violating Section 484(a) of the Penal Code (petty theft), a misdemeanor which bears a substantial relationship under Section 2910, title 10 of the Regulations to the qualifications, functions or duties of a real estate licensee.

GROUNDS FOR DENIAL

4.

Respondent's criminal convictions, as described above in Paragraphs 2 and 3, constitute grounds for denial of Respondent's application for a real estate license under sections 480(a) (conviction of crime) and 10177(b) (conviction of crime) of the Code.

MATTERS IN AGGRAVATION

5.

On or about August 31, 2009, in the Superior Court of the State of California, County of Fresno, Case Number M08924304, Respondent was convicted of violating Section 11550(a) of the Health and Safety Code (under the influence of controlled substances), and Section 273a(b) (child endangerment), misdemeanors.

6.

On or about September 26, 2007, in the Superior Court of the State of California, County of Fresno, Case Number M07910943, Respondent was convicted of violating Section 23152(a) of the Vehicle Code, a misdemeanor.

7.

On or about January 29, 2004, in the Superior Court of the State of California, County of Fresno, Case Number T03908594, Respondent was convicted of violating Section 23103 of the Vehicle Code (wet and reckless driving), a misdemeanor.

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WHEREFORE, 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, and for such other and further relief as may be proper under applicable provisions of the law.

BRENDA SMITH

Supervising Special Investigator

Dated at Fresno, California, this 25 day of January 2023.

DISCOVERY DEMAND

Pursuant to Sections 11507.6, et seq. of the Administrative Procedure Act, the

Department hereby makes demand for discovery pursuant to the guidelines set forth in the

Administrative Procedure Act. Failure to provide Discovery to the Department may result in the

exclusion of witnesses and documents at the hearing or other sanctions that the Office of

Administrative Hearings deems appropriate.