

1 JASON D. LAZARK, Counsel
2 State Bar No. 263714
3 Department of Real Estate
4 P.O. Box 137007
5 Sacramento, CA 95813-7007

6 Telephone: (916) 576-8700
7 (916) 576-7843 (Direct)
8 E-mail: jason.lazark@dre.ca.gov

FILED

JAN 27 2023

DEPARTMENT OF REAL ESTATE

By B. Nicholas

9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Application of:)

13 CHRISTOPHER JOHN BILBO,)

14 Respondent.)

No. H-3465 FR

STATEMENT OF ISSUES

15 The Complainant, BRENDA SMITH, acting in her official capacity as a
16 Supervising Special Investigator of the State of California, for Statement of Issues against
17 CHRISTOPHER JOHN BILBO (herein "Respondent"), is informed and alleges as follows:

18 1.

19 On or about May 10, 2021, Respondent made application to the Department of
20 Real Estate of the State of California for a real estate salesperson license.


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.

27 ///

1 WHEREFORE, Complainant prays that the above-entitled matter be set for
2 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
3 authorize the issuance of, and deny the issuance of, a real estate salesperson license to
4 Respondent, and for such other and further relief as may be proper under applicable provisions
5 of the law.

6
7 
8 BRENDA SMITH
9 Supervising Special Investigator

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

11
12 DISCOVERY DEMAND

13 Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the
14 Department hereby makes demand for discovery pursuant to the guidelines set forth in the
15 *Administrative Procedure Act*. Failure to provide Discovery to the Department may result in the
16 exclusion of witnesses and documents at the hearing or other sanctions that the Office of
17 Administrative Hearings deems appropriate.

18
19
20
21
22
23
24
25
26
27