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FILED

MAR 04 2016

BUREAU OF REAL ESTATE

By John C. Guille

BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

In the Matter of the Application of) No. H-04780 SD
)
AARON DAVID MOORE,) STATEMENT OF ISSUES
)
Respondent.)
_____)

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for Statement of Issues against AARON DAVID MOORE, a.k.a. Aaron Moore, Aaron Cross, or David Cross, ("Respondent"), is informed and alleges in her official capacity as follows:

1.

On or about December 2, 2014, Respondent made application to the Bureau of Real Estate of the State of California for a real estate salesperson license.

(CRIMINAL CONVICTIONS)

2.

On or about March 5, 2009, in the Superior Court of the State of California for the County of San Diego, Case No. SCD216136, Respondent pled guilty to and was convicted

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1 for violation of California Health and Safety Code Section 11377(a) (possession of a controlled
2 substance), a felony. Respondent was sentenced to 2 years and 8 months in prison. This
3 conviction bears a substantial relationship under Section 2910, Title 10, Chapter 6, California
4 Code of Regulations to the qualifications, functions or duties of a real estate licensee.

5 3.

6 On or about September 23, 2004, in the Superior Court of the State of California
7 for the County of San Diego, Case No. SCD177866, Respondent pled guilty to and was
8 convicted for violation of California Penal Code Sections 459 (burglary), 487(a) (grand theft of
9 personal property), and 470(d) (forgery of checks), all felonies. Respondent was sentenced to 4
10 years in prison. These convictions bear a substantial relationship under Section 2910, Title 10,
11 Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real
12 estate licensee.

13 4.

14 On or about February 22, 1999, in the Superior Court of the State of California
15 for the County of San Diego, Case No. SCN091585, Respondent pled guilty to and was
16 convicted for violation of California Penal Code Sections 459/460 (1st degree burglary) and
17 496(a) (receipt of stolen property), both felonies. Respondent was sentenced to 4 years and 8
18 months in prison. These convictions bear a substantial relationship under Section 2910, Title 10,
19 Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real
20 estate licensee.

21 5.

22 On or about October 28, 1998, in the Superior Court of the State of California
23 for the County of San Diego, Case No. SCE190416, Respondent pled guilty to and was
24 convicted for violation of California Penal Code Section 487(a) (theft), a felony. Respondent
25 was ordered to serve 180 days in jail. This conviction bears a substantial relationship under
26
27

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1 Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications,
2 functions or duties of a real estate licensee.

3 6.

4 The crimes of which Respondent was convicted, as alleged in Paragraphs 2
5 through 5, constitute cause for denial of Respondent's application for a real estate license under
6 Business and Professions Code Sections 475(a), 480(a)(1)-(2), and 10177(b).

7 (LICENSE DENIED BY ANOTHER AGENCY)

8 7.

9 On or about September 20, 2013, the California Department of Motor Vehicles,
10 in Case No. SP-13-009-005, issued a Notice and Order denying Respondent's application for a
11 California Occupational License, but granting Respondent a probationary license for 3 years,
12 subject to certain terms. The Order provided Respondent with an opportunity for a hearing. As
13 more fully set forth in the Order, the Department of Motor Vehicles found that Respondent was
14 convicted for burglary, theft, issuing false checks, and possession of a controlled substance, and
15 that Respondent failed to disclose these convictions in his application. These findings provided
16 cause to deny Respondent's application for an occupational license pursuant to California
17 Vehicle Code Section 11806.

18 8.

19 Respondent's application for an occupational license was denied, as described in
20 Paragraph 7 above, for acts which, if committed by a real estate licensee, would constitute
21 grounds for the denial, suspension or revocation of a California real estate license, pursuant to
22 Sections 10177(a) and 10177(b) of the Code.

23 9.

24 The prior license action against Respondent, as alleged in Paragraph 7 above,
25 constitutes cause for denial of Respondent's real estate salesperson application under Business
26 and Professions Code Section 10177(f).

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10.

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

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 AARON DAVID MOORE and for such other and further relief as may be proper under other applicable provisions of law.

Dated at San Diego, California

this 18th day of March, 2016


Veronica Kilpatrick
Supervising Special Investigator

cc: AARON DAVID MOORE
Colleen L. Moore
Veronica Kilpatrick
Sacto.

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