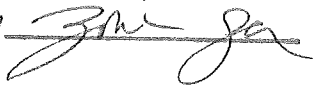


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FILED

JUL 19 2016

BUREAU OF REAL ESTATE

By 

BEFORE THE BUREAU OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

In the Matter of the Application of ) No. H-04812 SD  
)  
ALEJANDRO TYRONE BARAJAS, ) STATEMENT OF ISSUES  
)  
Respondent. )

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for Statement of Issues against ALEJANDRO TYRONE BARAJAS, a.k.a. Alejandro T. Barajas or Alejandro Barajas, ("Respondent"), is informed and alleges in her official capacity as follows:

1.

On or about February 27, 2015, 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 April 7, 2009, in the Superior Court of California, County of San Diego, Case No. SCE273705, Respondent pled guilty to and was convicted for violation of California Penal Code Sections 484 and 666 (petty theft with one prior conviction), a felony.

STATEMENT OF ISSUES –  
ALEJANDRO TYRONE BARAJAS

1 Probation was denied and Respondent was ordered to serve 32 months in prison and to pay  
2 various fines and fees. This conviction bears a substantial relationship under Section 2910, Title  
3 10, Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real  
4 estate licensee.

5 3.

6 On or about April 7, 2009, in the Superior Court of California, County of San  
7 Diego, Case No. SCE275964, Respondent pled guilty to and was convicted for violation of  
8 California Penal Code Section 1320(b) (failure to appear on own recognizance with one prior  
9 conviction), a felony. Probation was denied and Respondent was ordered to serve 81 days in  
10 prison. This conviction bears a substantial relationship under Section 2910, Title 10, Chapter 6,  
11 California Code of Regulations to the qualifications, functions or duties of a real estate licensee.

12 4.

13 On or about June 23, 2005, in the Superior Court of California, County of  
14 Riverside, Case No. SWF011553, Respondent was convicted for violation of California Penal  
15 Code Section 459 (burglary), a felony. Respondent was placed on formal probation for 4 years  
16 and ordered to serve 35 days in county jail. In addition, Respondent was ordered to pay various  
17 fines and fees. This conviction bears a substantial relationship under Section 2910, Title 10,  
18 Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real  
19 estate licensee.

20 5.

21 The crimes of which Respondent was convicted, as alleged in Paragraphs 2  
22 through 4 above, constitute cause for denial of Respondent's application for a real estate license  
23 under California Business and Professions Code Sections 475(a)(2), 480(a)(1), 10177(b) and  
24 10177(j).

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(FAILURE TO REVEAL CONVICTION)

6.

In response to Question 32 of Respondent's license application, to wit, "HAVE YOU EVER BEEN CONVICTED...OF ANY VIOLATION OF THE LAW AT THE MISDEMEANOR OR FELONY LEVEL? IF YES, COMPLETE ITEM 38 WITH INFORMATION ON EACH CONVICTION," Respondent marked "YES" but failed to reveal the conviction as alleged in Paragraph 3, above.

7.

Respondent's failure to reveal all of his convictions in his license application constitutes an attempt to procure a real estate license by fraud, misrepresentation, deceit, making a false statement of material fact, or by omitting to state a material fact required to be revealed in said application, which is grounds for denial of the issuance of a license under California Business and Professions Code Sections 475(a)(1) and 10177(a).

8.

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.

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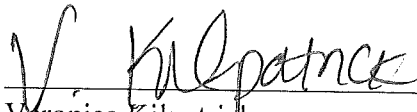
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1                    WHEREFORE, the Complainant prays that the above-entitled matter be set for  
2 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to  
3 authorize the issuance of, and deny the issuance of, a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

6  
7 Dated at San Diego, California

8 this 14<sup>th</sup> day of July, 2016  
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11   
12 Veronica Kilpatrick  
13 Supervising Special Investigator  
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25 cc: ALEJANDRO TYRONE BARAJAS  
26 Veronica Kilpatrick  
27 Sacto.

STATEMENT OF ISSUES –  
ALEJANDRO TYRONE BARAJAS