

FILED

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DEPT. OF REAL ESTATE

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BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Application of) No. H-05739 SD
MATTHEW WILBUR MCINTYRE,)
Respondent.) STATEMENT OF ISSUES

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for Statement of Issues against MATTHEW WILBUR MCINTYRE (“Respondent”) is informed and alleges in her official capacity as follows:

1.

On or about March 4, 2019, and May 10, 2022, Respondent made application to the Department of Real Estate (“Department”) of the State of California for a real estate salesperson license.

2.

On or about May 29, 2012, in the United States District Court, Southern District of California, Case No. 11-CR-03486-JAH-12, Respondent was convicted on a plea of guilty for violation of Title 18 of the United States Code section 371 (conspiracy to commit

1 wire fraud), a felony. The court placed Respondent on probation for three (3) years and ordered
2 to comply with the Home Confinement Program for sixty (60) days.

3 3.

4 The crime of which Respondent was convicted as described in Paragraph 2
5 above, bears a substantial relationship under Section 2910, Title 10, Chapter 6, of the California
6 Code of Regulations to the qualifications, functions or duties of a real estate licensee.

7 4.


8 The crime of which Respondent was convicted, as described in Paragraph 2
9 above, constitutes cause for denial of Respondent's application for a real estate license under
10 California Business and Professions Code sections 480(a)(1) and 10177(b).

11 5.

12 These proceedings are brought under the provisions of Section 10100, Division
13 4 of the Business and Professions Code of the State of California and Sections 11500 through
14 11528 of the California Government Code.

15 WHEREFORE, the Complainant prays that the above-entitled matter be set for
16 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
17 authorize the issuance of, and deny the issuance of, a real estate salesperson license to
18 Respondent MATTHEW WILBUR MCINTYRE and for such other and further relief as may
19 be proper under other applicable provisions of law.

20
21 Dated at San Diego, California this 3rd day of April, 2023.

22
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24 _____
Veronica Kilpatrick
Supervising Special Investigator

25 cc: MATTHEW WILBUR MCINTYRE
26 Veronica Kilpatrick
27 Sacto.