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2	Department of Real Estate
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8	BEFORE THE DEPARTMENT OF REAL ESTATE
9	STATE OF CALIFORNIA
10	***
11	In the Matter of the Application of)
12) NO. H-6975 SAC ERNESTO MANUEL AGUILA, JR.,)
13) <u>STATEMENT OF ISSUES</u>
14	Respondent.)
15	The Complainant, TRICIA D. PARKHURST, acting in her official capacity as a
16	Supervising Special Investigator of the State of California, for this Statement of Issues against
17	ERNESTO MANUEL AGUILA, JR. ("Respondent"), is informed and alleges as follows:
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19	On or about November 1, 2019, Respondent made application to the Department
20	of Real Estate of the State of California for a real estate salesperson license.
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22	On or about March 7, 2008, in the United States District Court, Eastern District of
23	California, Case No. 2:05CR00496-02, Respondent was convicted of violating Section
24	846.84(a)(1) (conspiracy to distribute methamphetamine), Title 21, of the United States Code, a
25	felony and a crime that bears a substantial relationship to the qualifications, functions or duties of
26	a real estate licensee pursuant to Section 2910, Title 10, of the California Code of Regulations.
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1	MATTER IN AGGRAVATION	
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3	On or about May 24, 2007, in the Superior Court of the State of California,	
4	County of San Joaquin, Case No. LM036845A, Respondent was convicted of violating Section	
5	23152(b) (driving under the influence-over .08%) of the California Vehicle Code, a	
6	misdemeanor.	
7	GROUNDS FOR DENIAL	
8	4	
9	Respondent's criminal convictions described above in Paragraph 2 constitutes	
10	cause for denial of Respondent's application for a real estate salesperson license pursuant to the	
11	provisions of Sections 480(a)(1) (conviction of crime) and 10177(b) (conviction of crime) of the	
12	Business and Professions Code.	
13	WHEREFORE, the Complainant prays that the above-entitled matter be set for	
14	hearing and, upon proof of the charges contained herein, that the Commissioner refuse to	
15	authorize the issuance of, and deny the issuance of, a real estate salesperson/broker license to	
16	Respondent, and for such other and further relief as may be proper under applicable provisions of	
17	law.	
18	TELCIA D. BARKHURST	
19	TRICIA D. PARKHURST Supervising Special Investigator	
20	·	
21	Dated at Sacramento, California,	
22	this 22^{10} day of 100^{10} , 2020.	
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DISCOVERY DEMAND

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2	Pursuant to Sections 11507.6, et seq. of the Administrative Procedure Act, the	
3	Department hereby makes demand for discovery pursuant to the guidelines set forth in the	
4	Administrative Procedure Act. Failure to provide Discovery to the Department may result in the	
5	exclusion of witnesses and documents at the hearing or other sanctions that the Office of	
6	Administrative Hearings deems appropriate.	
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