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FILED

JUN 14 2021

DEPARTMENT OF REAL ESTATE
By B. Nicholas

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Application of:)

12 ANTHONY VICTOR RUGGIERO,)

13 Respondent.)
14)

No. H-7052 SAC

STATEMENT OF ISSUES

15 The Complainant, TRICIA D. PARKHURST, in her official capacity as a
16 Supervising Special Investigator of the State of California, brings this Statement of Issues
17 against ANTHONY VICTOR RUGGIERO ("Respondent") and is informed and alleges as
18 follows:

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20 On or about April 24, 2020, Respondent made application to the Department of
21 Real Estate of the State of California ("Department") for a real estate salesperson license.

22 CRIMINAL CONVICTION

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24 On or about April 18, 2017, in the Superior Court of California, County of Placer,
25 Case No. 62149141, Respondent was convicted of violating California Vehicle Code Sections
26 23152(a) (driving under the influence), a misdemeanor and crime that bears a substantial

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1 relationship under Section 2910, Title 10, of the California Code of Regulations ("Regulations")
2 to the qualifications, functions, or duties of a real estate licensee.

3 MATTERS IN AGGRAVATION

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5 On or about July 7, 2004, in the Superior Court of California, County of
6 Sacramento, Case No. 04T01580, Respondent was convicted of violating Vehicle Code Section
7 23152(a) (driving under the influence), a misdemeanor.

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9 On or about November 4, 2001, in the Superior Court of California, County of
10 Contra Costa, Case No. 01-029641, Respondent was convicted of violating Penal Code Section
11 647(f) (drunk in public), a misdemeanor.

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13 On or about May 13, 1997, in the Superior Court of California, County of Butte,
14 Case No. NCR72494, Respondent was convicted of violating Vehicle Penal Section 243(e)
15 (battery against a spouse, former spouse, or cohabitant), a misdemeanor.

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17 On or about February 25, 1997, in the Superior Court of California, County of
18 Butte, Case No. CM008278, Respondent was convicted of violating Penal Code Section 594(a)
19 (vandalism) and 242 (battery), misdemeanors.

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21 On or about July 28, 1993, in the Superior Court of California, County of Contra
22 Costa, Case No. 98T05468, Respondent was convicted of violating Vehicle Code Section 23103
23 (wet reckless driving), a misdemeanor.

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1 became effective November 13, 2007. Pursuant to the Stipulation and Agreement, the
2 Department granted Respondent a two-year restricted real estate salesperson license subject to
3 terms and conditions.

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5 On or about May 27, 2009, the Department suspended Respondent's restricted
6 real estate salesperson license because Respondent failed to comply with the terms and
7 conditions of the Stipulation and Agreement; specifically, completing the education
8 requirements of Section 10153.4 of the Code.

9 15

10 On or about November 25, 2011, Respondent's restricted real estate salesperson
11 license expired.

12 GROUND TO DENY APPLICATION

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14 The facts alleged above in Paragraph 2 constitute grounds for denial of
15 Respondent's application for a real estate salesperson license pursuant to Sections 480(a)
16 (conviction of a crime) and 10177(b) (conviction of crime substantially related to the
17 qualifications, functions, or duties of a real estate licensee) of the Code.

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

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24 TRICIA D. PARKHURST
25 Supervising Special Investigator

26 Dated at Sacramento, California
27 this 11th day of June, 2021.

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