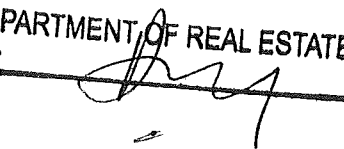


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FILED

JUN 10 2013

DEPARTMENT OF REAL ESTATE
BY: 

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)	No. H-38905 LA
JUANCARLOS GUERRERO)	<u>A C C U S A T I O N</u>
Respondent.)	

The Complainant, Robin Trujillo, a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against JUANCARLOS GUERRERO, also known as Juan Carlos Guerrero, ("Respondent") alleges as follows:

1.

The Complainant, Robin Trujillo, a Deputy Real Estate Commissioner of the State of California, makes this Accusation in her official capacity.

2.

Respondent is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the

1 California Business and Professions Code ("Code"), as a real
2 estate salesperson.

3 3.

4 (CRIMINAL CONVICTIONS)

5 On or about January 25, 2011, in the Superior Court
6 for the State of California, County of San Diego, in Case No.
7 M114001, Respondent was convicted of violating California Penal
8 Code Section 12025(a)(1) [having concealed firearm in vehicle],
9 misdemeanor. The underlying facts of this crime bear a
10 substantial relationship under Section 2910, Title 10, Chapter
11 6, California Code of Regulations to the qualifications,
12 functions or duties of a real estate licensee.

13 4.

14 On or about July 27, 2010, in the Superior Court for
15 the State of California, County of Ventura, in Case No.
16 2010011757 MA, Respondent was convicted of violating California
17 Penal Code Section 148(a)(1) [resist, obstruct, delay of peace
18 officer], a misdemeanor. The underlying facts of this crime bear
19 a substantial relationship under Section 2910 of the Regulations
20 to the qualifications, functions or duties of a real estate
21 licensee.

22 5.

23 On or about July 7, 2010, in the Superior Court for
24 the State of California, County of Ventura, in Case No.
25 2010019639 FA, Respondent was convicted of violating California
26 Penal Code Section 368(b)(1) [elder or dependent adult abuse], a
27

1 felony, and Penal Code Section 69 [resisting executive officer],
2 a felony. The underlying facts of these crimes bear a
3 substantial relationship under Section 2910 of the Regulations
4 to the qualifications, functions or duties of a real estate
5 licensee.

6 6.

7 On or about July 7, 2010, in the Superior Court for
8 the State of California, County of Ventura, in Case No.
9 2010014888 MA, Respondent was convicted of violating California
10 Penal Code Section 417(a)(1) [exhibit deadly weapon - non-
11 firearm], a misdemeanor. The underlying facts of this crime bear
12 a substantial relationship under Section 2910 of the Regulations
13 to the qualifications, functions or duties of a real estate
14 licensee.

15 7.

16 On or about June 24, 2010, in the Superior Court for
17 the State of California, County of Ventura, in Case No.
18 2010015490 MA, Respondent was convicted of violating California
19 Penal Code Section 148(a)(1) [resist, obstruct, delay of peace
20 officer or EMT], a misdemeanor. The underlying facts of this
21 crime bear a substantial relationship under Section 2910 of the
22 Regulations to the qualifications, functions or duties of a real
23 estate licensee.

24 8.

25 The crimes of which Respondent was convicted, as described
26 in Paragraphs 3 through 7, above, constitute cause under
27

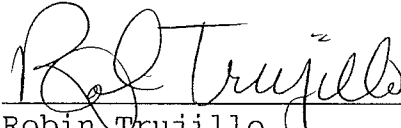
1 Sections 490 and 10177(b) of the Code for the suspension or
2 revocation of the license and license rights of Respondent under
3 the Real Estate Law.

4 Code Section 10106 provides, in pertinent part, that
5 in any order issued in resolution of a disciplinary proceeding
6 before the Department, the Commissioner may request the
7 administrative law judge to direct a licensee found to have
8 committed a violation of this part to pay a sum not to exceed
9 the reasonable costs of investigation and enforcement of the
10 case.

11 WHEREFORE, Complainant prays that a hearing be
12 conducted on the allegations of this Accusation and that upon
13 proof thereof, a decision be rendered imposing disciplinary
14 action against all the licenses and license rights of Respondent
15 JUANCARLOS GUERRERO under the Real Estate Law (Part 1 of
16 Division 4 of the Business and Professions Code), for the cost
17 of investigation and enforcement, and for such other and further
18 relief as may be proper under other applicable provisions of
19 law.
20

21 Dated at Los Angeles, California

22 this 7 day of June, 2013.

23
24 
25 Robin Trujillo
26 Deputy Real Estate Commissioner

26 cc: JUANCARLOS GUERRERO
27 Robin Trujillo
Sacto.