

FILED

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BUREAU OF REAL ESTATE

By *Al Salorio*

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9 **BEFORE THE BUREAU OF REAL ESTATE**

10 **STATE OF CALIFORNIA**

11 * * *

12 In the Matter of the Application of) No. H-40013 LA
13 STEPHEN RIDINGS HAYDEN IV,) STATEMENT OF ISSUES
14 Respondent.)
15 _____)

16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
17 State of California, for Statement of Issues against STEPHEN RIDINGS HAYDEN IV, a.k.a.
18 STEPHEN RIDINGS ("Respondent"), is informed and alleges as follows:

19 1.

20 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
21 State of California, makes this Statement of Issues in her official capacity.

22 2.

23 On or about December 22, 2014, Respondent made application to the Bureau of
24 Real Estate of the State of California for a real estate salesperson license.

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Statement of Issues of Stephen Ridings Hayden IV

1 FIRST CAUSE FOR DENIAL
2 (CRIMINAL CONVICTIONS)

3 3.

4 On or about April 9, 2010, Respondent pled guilty and was convicted in the
5 Superior Court of California, County of Riverside, Case No. SWM10001190, for violation of
6 California Vehicle Code Section 23152(a) (Driving Under The Influence), a misdemeanor, and
7 Vehicle Code Section 23152(b) with enhancement under Vehicle Code Section 23578 (Driving
8 With A Blood Alcohol Level Of 0.08 Percent Or Higher), a misdemeanor. Respondent was
9 placed on 36 months of summary probation, and ordered to serve 12 days in jail and pay fines
10 and fees. Additionally, Respondent was ordered to complete an AB1353 1st Offender Drinking
11 Driver Program.

12 4.

13 On or about February 26, 2013, Respondent pled guilty and was convicted in the
14 Superior Court of California, County of Riverside, Case No. SWM1300686, for violation of
15 California Vehicle Code Section 23152(b) (Driving Under The Influence), a misdemeanor,
16 Vehicle Code Section 14601.2(a) (Driving When Privilege Suspended Or Revoked For Driving
17 Under The Influence), a misdemeanor, and Penal Code Section 273a(a) (Endangering Child), a
18 misdemeanor. Respondent was placed on 48 months of summary probation, and ordered to
19 serve 45 days in jail and pay fines and fees. Additionally, Respondent was ordered to complete
20 an SB38 18 month Offender Drinking Driver Program.

21 5.

22 The convictions described in Paragraphs 3 and 4 bear a substantial relationship
23 under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications,
24 functions or duties of a real estate licensee.

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Statement of Issues of Stephen Ridings Hayden IV

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6.

The crimes of which Respondent was convicted, as described in Paragraphs 3 and 4 above, constitute cause for denial of Respondent's application for a real estate license under Business and Professions Code Sections 475(a)(2)-(3), 480(a)(1)-(2), and 10177(b).

SECOND CAUSE FOR DENIAL

(FAILURE TO REVEAL CONVICTIONS ON LICENSE APPLICATION)

7.

In response to Question 27, under the Background Information section of his license application, to wit, "HAVE YOU EVER BEEN CONVICTED (SEE PARAGRAPH ABOVE) OF ANY VIOLATION OF THE LAW AT THE MISDEMEANOR OR FELONY LEVEL? IF YES, COMPLETE ITEM 33 WITH INFORMATION ON EACH CONVICTION", Respondent answered "YES," and failed to disclose the convictions for Vehicle Code Section 14601.2(a) (Driving When Privilege Suspended Or Revoked For Driving Under The Influence) and Penal Code Section 273a(a) (Endangering Child) described in Paragraph 4, above.

8.

Respondent's failure to reveal the convictions for Vehicle Code Section 14601.2(a) (Driving When Privilege Suspended Or Revoked For Driving Under The Influence) and Penal Code Section 273a(a) (Endangering Child), as set forth in Paragraph 4 above, in his license application constitutes an attempt to procure a real estate license by fraud, misrepresentation, or deceit, or by making a false statement of 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), 480(d), and 10177(a).

9.

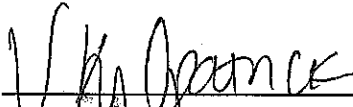
These proceedings are brought under the provisions of Section 10100, Division 4 of the Business and Professions Code of the State of California and Sections 11500 through 11528 of the California Government Code.

Statement of Issues of Stephen Ridings Hayden IV

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

Dated at San Diego, California
this 2nd day of November, 2015



Veronica Kilpatrick
Supervising Special Investigator

cc: STEPHEN RIDINGS HAYDEN IV
Veronica Kilpatrick
Sacto.