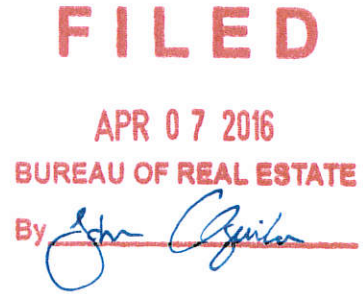


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BEFORE THE BUREAU OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Application of)	No. H- 40194 LA
)	
MILES MOORE,)	<u>STATEMENT OF ISSUES</u>
)	
Respondent.)	
)	

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for Statement of Issues against MILES MOORE, a.k.a. Miles Alton Moore, ("Respondent"), is informed and alleges in her official capacity as follows:

1.

On or about March 23, 2015, Respondent made application to the Bureau of Real Estate of the State of California for a real estate salesperson license.

(CRIMINAL CONVICTIONS)

2.

On or about March 17, 1999, in the Circuit Court of the State of Oregon for the County of Clackamas, Case No. 98-13680, Respondent pled guilty to and was convicted on 2 counts for violation of Oregon Revised Statute Section 165.007 (forgery in the 2nd degree), misdemeanors.

STATEMENT OF ISSUES – MILES MOORE

1 These convictions bear a substantial relationship under Section 2910, Title 10, Chapter 6,
2 California Code of Regulations to the qualifications, functions or duties of a real estate licensee.

3 3.

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

7 (FAILURE TO REVEAL CONVICTIONS)

8 4.

9 In response to Question 27 of his license application, to wit: "HAVE YOU
10 EVER BEEN CONVICTED OF ANY VIOLATION OF THE LAW AT THE
11 MISDEMEANOR OR FELONY LEVEL?" Respondent answered "NO," and failed to disclose
12 the convictions described in Paragraph 2 above.

13 5.

14 Respondent's failure to reveal these convictions, as set forth in Paragraph 2
15 above, in his license application constitutes an attempt to procure a real estate license by fraud,
16 misrepresentation, or deceit, or by making a false statement of material fact required to be
17 revealed in said application, which is grounds for denial of the issuance of a license under
18 California Business and Professions Code Sections 475(a)(1), 480(d), and 10177(a).

19 6.

20 These proceedings are brought under the provisions of Section 10100, Division
21 4 of the Business and Professions Code of the State of California and Sections 11500 through
22 11528 of the California Government Code.

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27 ///

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

6
7 Dated at San Diego, California,
8 this 4th day of April, 2016

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10
11 V. Kilpatrick
12 Veronica Kilpatrick
13 Supervising Special Investigator
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22 cc: MILES MOORE
23 Veronica Kilpatrick
24 Sacto.
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