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FILED

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BUREAU OF REAL ESTATE

By *At Delorio*

BEFORE THE BUREAU OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Application of	)	No. H- 40707 LA
	)	
DEJUAN RYAN SWANSON,	)	<u>STATEMENT OF ISSUES</u>
	)	
Respondent.	)	
	)	

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, acting in her official capacity, for Statement of Issues against DEJUAN RYAN SWANSON ("Respondent") alleges as follows:

1.

On or about June 6, 2016, Respondent made application to the Bureau of Real Estate of the State of California for a real estate salesperson license.

FIRST CAUSE OF ACTION

(CRIMINAL CONVICTIONS)

2.

On or about October 26, 2010, in the Superior Court of California, County of San Bernardino, case no. MO00719152DS, Respondent was convicted of violating California

1 Vehicle Code section 14601.1(a) (driving while license suspended), a misdemeanor. In part,
2 Respondent was sentenced to 24 months of summary probation, serve two (2) days in jail with
3 two (2) days credit, and pay various fines and fees. Said crime bears a substantial relationship
4 to the qualifications, functions, or duties of a real estate licensee under Section 2910, Title 10,
5 Chapter 6, California Code of Regulations.

6 3.

7 On or about October 30, 2013, in the Superior Court of California, County of
8 Riverside, case no. RIF1306292, Respondent was convicted of violating California Vehicle
9 Code section 23153(a) (proximately causing bodily injury to another person while driving
10 under the influence), a felony, with the allegation that Respondent personally inflicted great
11 bodily injury on another within the meaning of California Penal Code sections 12022.7(a) and
12 1192.7(c)(8). In part, Respondent was sentenced to 36 months of formal probation, complete a
13 1st Offender Drinking Driver Program, pay restitution to the victim, and pay various fines and
14 fees. Said crime bears a substantial relationship to the qualifications, functions, or duties of a
15 real estate licensee under Section 2910, Title 10, Chapter 6, California Code of Regulations.

16 4.

17 The crimes of which Respondent was convicted as alleged above constitute
18 cause for denial of Respondent's application for a real estate license under California Business
19 and Professions Code sections 475(a)(2), 480(a), and 10177(b).

20
21 SECOND CAUSE OF ACTION
22 (FAILURE TO REVEAL CONVICTION)

23 5.

24 In response to Question 28 of his license application, to wit: "HAVE YOU
25 EVER BEEN CONVICTED (SEE PARAGRAPH ABOVE) OF ANY VIOLATION OF THE
26 LAW AT THE MISDEMEANOR OR FELONY LEVEL? IF YES, COMPLETE ITEM 34
27

1 WITH INFORMATION ON EACH CONVICTION," Respondent answered, "Yes," but failed
2 to reveal the conviction described in Paragraph 2, above.

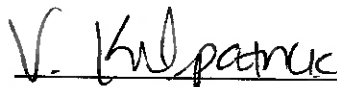
3 6.

4 Respondent's failure to reveal this conviction in his license application
5 constitutes knowingly making a false statement of material facts required to be revealed in said
6 application, which is grounds for denial of the issuance of a license under California Business
7 and Professions Code sections 475(a)(1), 480(d), and 10177(a).

8 These proceedings are brought under the provisions of Section 10100, Division
9 4 of the Business and Professions Code of the State of California and Sections 11500 through
10 11528 of the California Government Code.

11 WHEREFORE, the Complainant prays that the above-entitled matter be set for
12 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
13 authorize the issuance of, and deny the issuance of, a real estate salesperson license to
14 Respondent DEJUAN RYAN SWANSON and for such other and further relief as may be
15 proper under other applicable provisions of law.

16 Dated at San Diego, California: June 11, 2017.

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19 Veronica Kilpatrick
20 Supervising Special Investigator

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25 cc: DEJUAN RYAN SWANSON
26 Veronica Kilpatrick
27 Sacto