

FILED

AUG 01 2019

DEPT. OF REAL ESTATE

By John Aguirre

1 LAURENCE D. HAVESON, Counsel (SBN 152631)
2 Department of Real Estate
3 320 West 4th Street, Suite 350
4 Los Angeles, California 90013-1105
5 Telephone: (213) 576-6982
6 Direct: (213) 576-6911
7 Fax: (213) 576-6917
8 *Attorney for Complainant*

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Application of) No. H-41440 LA
12 JASON ALEXANDER THOMAS,) STATEMENT OF ISSUES
13 Respondent.)
14 _____)

15 The Complainant, Maria Suarez, a Supervising Special Investigator for the Department of
16 Real Estate ("Department") of the State of California, for cause of for Statement of Issues against
17 JASON ALEXANDER THOMAS ("Respondent"), is informed and alleges in her official
18 capacity as follows:

19 1. On or about March 4, 2019, Respondent made application to the Department for a
20 real estate salesperson license.

21 FIRST CAUSE FOR DENIAL
22 (CRIMINAL CONVICTIONS)

23 2. On or about October 29, 2003, in the Superior Court of California, County of Los
24 Angeles, Case No. 3MT08301, Respondent was convicted on a plea of nolo contendere for
25 violation of Vehicle Code section 23152(b) (driving with blood alcohol of 0.08%), a
26 misdemeanor. The court suspended the imposition of sentence and placed Respondent on
27 summary probation for 36 months subject to certain terms and conditions including, but not
28 limited to, serving 1 day of jail time, less credit for 1 day, payment of fines, assessments, and fees,

1 or serve 13 days jail time, or in lieu of jail or fines, perform 13 days of CalTrans, and ordered
2 Respondent to complete a 3-month first-offender alcohol and other drug education and counseling
3 program, and restrict driving for 90 days to and from work, during work, and to and from the
4 program.

5 3. On or about November 24, 2013, in the Superior Court of California, County of
6 Los Angeles, Case No. 3CR14958, Respondent was found guilty and convicted on a plea of nolo
7 contendere for violation of Penal Code section 484(a) (petty theft), a misdemeanor. The court
8 suspended the imposition of sentence and placed Respondent on summary probation for 12
9 months subject to certain terms and conditions including, but not limited to, paying fines,
10 assessments, and fees, or serving 5 days jail time, or in lieu of jail or fines, perform 5 days of
11 CalTrans, and stay at least 100 yards from the Bloomingdale's store at 8500 Beverly Boulevard in
12 Los Angeles.

13 4. The crimes of which Respondent was convicted, as described in Paragraphs 2 and 3
14 above, by their facts and circumstances, bear a substantial relationship under Section 2910, Title
15 10, Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real
16 estate licensee.

17 5. The crimes of which Respondent was convicted, as described in Paragraphs 2 and 3
18 above, constitute cause for denial of Respondent's application for a real estate license under
19 California Business and Professions Code sections 480(a)(1) and 10177(b).

20 SECOND CAUSE FOR DENIAL

21 (FAILURE TO DISCLOSE CONVICTIONS)

22 6. On or about March 4, 2019, Respondent submitted an application for a real estate
23 salesperson license. In response to Question 23, under "BACKGROUND INFORMATION," of
24 Respondent's license application, to wit, "HAVE YOU EVER BEEN CONVICTED (SEE
25 PARAGRAPH ABOVE) OF ANY VIOLATION OF THE LAW AT THE MISDEMEANOR OR
26 FELONY LEVEL? IF YES, COMPLETE ITEM 29 WITH INFORMATION ON EACH
27 CONVICTION," Respondent marked "NO."

28

1 7. Respondent's failure to disclose the convictions, as set forth in Paragraphs 2 and 3
2 above, in his license application constitutes an attempt to procure a real estate license by fraud,
3 misrepresentation, or deceit, or by making a material misstatement of fact in an application, which
4 is grounds for denial of the issuance of a license under California Business and Professions Code
5 Section 10177(a).

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

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

14 Dated at Los Angeles, California this 31st day of July, 2019.

15
16
17
18 
19 Maria Suarez
20 Supervising Special Investigator

21 cc: JASON ALEXANDER THOMAS
22 Maria Suarez
23 Sacto.
24
25
26
27
28