

FILED

February 17, 2022

Department of Real Estate

By



1 KATHY YI, Counsel (SBN 236736)
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) 576-6940
7 Fax: (213) 576-6917
8 *Attorney for Complainant*

9
10 BEFORE THE DEPARTMENT OF REAL ESTATE

11 STATE OF CALIFORNIA

12 * * *

13 In the Matter of the Application of) No. H-42194 LA
14)
15 JEFFREY ROGER MONROE,) STATEMENT OF ISSUES
16)
17 Respondent.)
18)
19)
20)
21)
22)
23)
24)
25)
26)
27)

28 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
29 State of California, for Statement of Issues against JEFFREY ROGER MONROE, a.k.a.
30 "Jeffrey R. Monroe" and "Jeffrey Monroe" ("Respondent"), is informed and alleges in her
31 official capacity as follows:

32 1.

33 On or about April 20, 2020, Respondent made application to the Department of
34 Real Estate of the State of California for a real estate salesperson exam/license.

35 ///

36 ///

37 ///

38 ///

STATEMENT OF ISSUES

1 (CRIMINAL CONVICTION)

2 2.

3 On or about June 25, 2019, in the Superior Court of California, County of
4 Orange, Case No. 18HM13197, Respondent was convicted, on pleas of guilty, for violating
5 Vehicle Code sections 23152(a) (DUI) and 23152(b) (DUI with .08% or more BAC), enhanced
6 by section 23538(b)(2) (BAC in excess of .20%), and section 31 (false information to a police
7 officer), all misdemeanors. The court suspended the imposition of sentence and placed
8 Respondent on 3 years of informal probation under certain terms and conditions, including 60
9 days in county jail, 15 days of Cal Trans, 9 months of Level 2 Alcohol Program, Victim Impact
10 counseling, MADD-Southern California Victim Impact, and payment of fines and fees.

11 3.

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

16 4.

17 The crimes of which Respondent was convicted, as described in Paragraph 2
18 above, constitute cause for denial of Respondent's application for a real estate license under
19 California Business and Professions Code sections 475(a)(2), 480(a)(1) and 10177(b).

20 5.

21 These proceedings are brought under the provisions of Section 10100, Division
22 4 of the Business and Professions Code of the State of California and Sections 11500 through
23 11528 of the California Government Code.

24 (IN AGGRAVATION)

25 6.

26 On or about May 1, 2008, in the Superior Court of California, County of
27 Orange, Case No. 08HM01723, Respondent was convicted, on pleas of guilty, for violating

1 Vehicle Code sections 23152(a) (DUI) and 23152(b) (DUI with .08% BAC or higher),
2 enhanced by section 23538(b)(2) (BAC in excess of .20%), and section 14601.2(a) (driving on
3 suspended license), all misdemeanors. The court suspended the imposition of sentence and
4 placed Respondent on 5 years of formal probation under certain terms and conditions,
5 including 180 days in county jail that was stayed pending completion of DUI court program
6 and the rest term served on supervised electronic confinement and payment of fines and fees.

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

12
13 Dated at San Diego, California

14 this 8 day of February, 2022.

15
16 *Veronica Kilpatrick*

17 _____
18 Veronica Kilpatrick
19 Supervising Special Investigator
20
21
22
23
24

25 cc: JEFFREY ROGER MONROE
26 Veronica Kilpatrick
27 Sacto.