

1 2.

2 On or about February 27, 2020, Respondent made application to the Department
3 of Real Estate of the State of California for a real estate salesperson license.

4 3.

5 On or about May 12, 1992, Respondent pled guilty and was convicted in the
6 Superior Court of California, County of Los Angeles, Case No. GA007842-01, for violation of
7 two count of California Penal Code section 487(1) (Grand Theft of Personal Property), a felony.
8 Respondent was ordered to serve three years in prison.

9 4.

10 On or about November 3, 1992, Respondent pled guilty and was convicted in the
11 United States District Court Southern District of California, Case No. 91-0187-B, for violation
12 of United States Code, Title 18, section 1029(a)(1) (Production of Counterfeit Access Devices),
13 a felony. Respondent was placed on three years of supervised release, and ordered to serve
14 18 months in prison and pay fines and fees. On or about September 16, 1996, Respondent
15 admitted violation of supervised release, and was ordered to serve 10 months in prison.

16 5.

17 On or about February 8, 1994, Respondent pled guilty and was convicted in the
18 Superior Court of California, County of Los Angeles, Case No. KA020391-01, for violation of
19 California Penal Code section 532a(1) with enhancement under section 667.5(b) (False
20 Financial Statements), a felony, and Penal Code section 664/484f(2) (Attempted Fraudulent
21 Use of Counterfeit Access Card), a felony. Respondent was ordered to serve two years and four
22 months in prison.

23 6.

24 On or about August 1, 1995, Respondent pled guilty and was convicted in the
25 Superior Court of California, County of San Bernardino, Case No. FWV07855, for violation of
26 California Penal Code section 484e(f) (Fraudulent Acquisition, Use, or Transfer of Access
27 Cards), a felony. Respondent was ordered to serve two years in prison and pay fines.

Statement of Issues of Donise Warren

1 7.

2 On or about August 12, 1998, Respondent pled guilty and was convicted in the
3 Superior Court of California, County of Orange, Case No. 98HF0798, for violation of
4 California Penal Code section 459-460(b) (Burglary Second Degree), a felony, Penal Code
5 section 487(a) (Grand Theft), a felony, Penal Code section 484f(b) (Use of Another's Credit
6 Card), a felony, and Penal Code section 470(a) (Forgery of Checks), a felony. Respondent was
7 ordered to serve 16 months in prison.

8 8.

9 On or about February 3, 2000, Respondent pled guilty and was convicted in the
10 Superior Court of California, County of Riverside, Case No. RIF088822, for violation of
11 California Penal Code section 182/530.5 with enhancement under sections 667.5(b)
12 and 12022.6(a)(1) (Conspiracy Unauthorized Use of Personal Identifying Information), a
13 felony. Respondent was ordered to serve eight years in prison and pay restitution in the amount
14 of \$44,734.41, fines and fees.

15 9.

16 The convictions described in Paragraphs 3 through 8 bear a substantial
17 relationship under section 2910, Title 10, Chapter 6, California Code of Regulations to the
18 qualifications, functions or duties of a real estate licensee.

19 10.

20 The crimes of which Respondent was convicted, as described in Paragraphs 3
21 through 8 above, constitutes cause for denial of Respondent's application for a real estate
22 license under Business and Professions Code sections 475(a)(2)-(3), 480(a)(1)-(2), and
23 10177(b)(1).

24 11.

25 These proceedings are brought under the provisions of section 10100,
26 Division 4 of the Business and Professions Code of the State of California and sections 11500
27 through 11528 of the California Government Code.

Statement of Issues of Donise Warren

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 DONISE WARREN and for such other and further relief as may be proper under
5 other applicable provisions of law.

6
7 Dated at San Diego, California

8 this 11 day of February, 2022

9
10 *Veronica Kilpatrick*

11 Veronica Kilpatrick
12 Supervising Special Investigator

13 cc: DONISE WARREN
14 Veronica Kilpatrick
15 Sacto.
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Statement of Issues of Donise Warren