

1 STEVE CHU, Counsel (SBN 238155)  
2 Department of Real Estate  
3 320 West 4th Street, Suite 350  
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5 Telephone: (213) 620-6430  
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**FILED**  
OCT 14 2022  
DEPT. OF REAL ESTATE  
By *[Signature]*

9 BEFORE THE DEPARTMENT OF REAL ESTATE  
10 STATE OF CALIFORNIA

11 \* \* \*

12 In the Matter of the Application of ) No. H-42307 LA  
13 FRANK ALARCON RAMIREZ JR., ) FIRST AMENDED  
14 Respondent. ) STATEMENT OF ISSUES  
15 \_\_\_\_\_ )

16 This First Amended Statement of Issues amends the Statement of Issues filed on  
17 October 5, 2022. The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of  
18 the State of California, for Statement of Issues against FRANK ALARCON RAMIREZ JR.,  
19 a.k.a. FRANK ALARCON RAMIREZ (“Respondent”), is informed and alleges as follows:

20 1.

21 The Complainant, Veronica Kilpatrick, acting in her official capacity as a  
22 Supervising Special Investigator of the State of California, makes this Statement of Issues  
23 against FRANK ALARCON RAMIREZ JR.

24 2.

25 On or about August 16, 2018, Respondent made application to the Department  
26 of Real Estate of the State of California for a real estate salesperson license.

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1 3.

2 On or about October 30, 2019, Respondent pled guilty and was convicted in the  
3 Superior Court of California, County of Ventura, Case No. 2019024340 M A, for violation of  
4 California Vehicle Code section 12500(a) (Unlawful to Drive unless Licensed), a misdemeanor.  
5 Respondent was placed on 36 months of conditional revocable release, and ordered to serve one  
6 day in jail and pay fines and fees. Additionally, Respondent was ordered to complete Work  
7 Release.

8 4.

9 On or about January 7, 2021, Respondent pled guilty and was convicted in the  
10 Superior Court of California, County of Ventura, Case No. 2019005574 M A, for violation of  
11 California Vehicle Code section 23153(a) (Causing Bodily Injury while Driving under the  
12 Influence), a misdemeanor, with enhancement under Vehicle Code section 23578. Respondent  
13 was placed on 36 months of conditional revocable release, and ordered to serve 10 days in jail  
14 and pay restitution, fines and fees. Additionally, Respondent was ordered to participate in the  
15 Driving Under the Influence Program for six months and to complete Work Release.

16 5.

17 The convictions described in Paragraphs 3 and 4 bear a substantial relationship  
18 under section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications,  
19 functions or duties of a real estate licensee.

20 6.

21 The crimes of which Respondent was convicted, as described in Paragraphs 3  
22 and 4 above, constitute cause for denial of Respondent's application for a real estate license  
23 under Business and Professions Code sections 475(a)(2)-(3), 480(a)(1)-(2), and 10177(b)(1).

24 7.

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.

First Amended Statement of Issues of Frank Alarcon Ramirez Jr.

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

Dated at San Diego, California  
this 13th day of October, 2022.

*Maria Suarez for V Kilpatrick*  
Veronica Kilpatrick  
Supervising Special Investigator

cc: FRANK ALARCON RAMIREZ JR.  
Veronica Kilpatrick  
Sacto.

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9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 \* \* \*

12 In the Matter of the Application of	)	No. H-42307 LA
	)	
13 FRANK ALARCON MARTINEZ JR.,	)	<u>STATEMENT OF ISSUES</u>
	)	
14 Respondent.	)	
	)	

16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the  
17 State of California, for Statement of Issues against FRANK ALARCON MARTINEZ JR.,  
18 a.k.a. FRANK ALARCON MARTINEZ (“Respondent”), is informed and alleges as follows:

19 1.

20 The Complainant, Veronica Kilpatrick, acting in her official capacity as a  
21 Supervising Special Investigator of the State of California, makes this Statement of Issues  
22 against FRANK ALARCON MARTINEZ JR.

23 2.

24 On or about August 16, 2018, Respondent made application to the Department  
25 of Real Estate of the State of California for a real estate salesperson license.

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Statement of Issues of Frank Alarcon Martinez Jr.

1 3.

2 On or about October 30, 2019, Respondent pled guilty and was convicted in the  
3 Superior Court of California, County of Ventura, Case No. 2019024340 M A, for violation of  
4 California Vehicle Code section 12500(a) (Unlawful to Drive unless Licensed), a misdemeanor.  
5 Respondent was placed on 36 months of conditional revocable release, and ordered to serve one  
6 day in jail and pay fines and fees. Additionally, Respondent was ordered to complete Work  
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22 and 4 above, constitute cause for denial of Respondent's application for a real estate license  
23 under Business and Professions Code sections 475(a)(2)-(3), 480(a)(1)-(2), and 10177(b)(1).

24 7.

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 Frank Alarcon Martinez Jr.

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

Dated at San Diego, California  
this 5th day of October, 2022.

*Maria Suarez for V Kilpatrick*  
Veronica Kilpatrick  
Supervising Special Investigator

cc: FRANK ALARCON MARTINEZ JR.  
Veronica Kilpatrick  
Sacto.