| 1 | DIANE LEE, Counsel (SBN 247222) |
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| 3 | Los Angeles, California 90013 |
| 4 | Telephone: (213) 576-6982 (Direct) (213) 576-6907 • AUG - 8 2014 |
| 5 | BUREAU OF REAL ESTATE |
| 6 | By chilles |
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| 8 | BEFORE THE BUREAU OF REAL ESTATE |
| 9 | STATE OF CALIFORNIA |
| 10 | * * * |
| 11 | In the Matter of the Application of) No. $H-39573$ LA |
| 12 | BRADLEY RONALD FOX, <u>STATEMENT OF ISSUES</u> |
| 13 | Respondent. |
| 14 | / |
| 15 | The Complainant, Robin Trujillo, a Deputy Real Estate |
| .16 | Commissioner of the State of California, acting in her official |
| 17 | capacity, for Statement of Issues against BRADLEY RONALD FOX aka |
| 18 | Brad Fox ("Respondent") alleges as follows: |
| 19 | 1. |
| 20 | On or about March 5, 2013, Respondent made application |
| 21 | to the Bureau of Real Estate of the State of California for a |
| 22 | real estate salesperson license. |
| 23 | |
| 24 | (CRIMINAL CONVICTIONS) |
| 25 | 2. |
| 26 | On or about November 27, 2002, in the Superior Court |
| 27 | of California, County of San Bernardino, Case No. FVI015596, |
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Respondent was convicted of violating California Penal Code
 section 524 (extortion), a felony. Said crime bears a
 substantial relationship to the qualifications, functions, or
 duties of a real estate licensee under Section 2910, Title 10,
 Chapter 6, California Code of Regulations.

3.

On or about November 17, 2005, in the Superior Court
of California, County of San Diego, Case No. S197630, Respondent
was convicted of violating California Vehicle Code section
23152(a) (driving under the influence), a misdemeanor. Said
crime bears a substantial relationship to the qualifications,
functions, or duties of a real estate licensee under Section
2910, Title 10, Chapter 6, California Code of Regulations.

4.

On or about April 11, 2006, in the Superior Court of 15 California, County of San Bernardino, Case No. FVI023097, 16 Respondent was convicted of violating California Penal Code 17 section 261.5(c) (sex with a minor more than 3 years younger), a 18 felony. Said crime bears a substantial relationship to the 19 qualifications, functions, or duties of a real estate licensee 20 under Section 2910, Title 10, Chapter 6, California Code of 21 Regulations. 22

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5.

The crimes of which Respondent was convicted as alleged in Paragraphs 2 through 4, above, constitute cause for denial of Respondent's application for a real estate license

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under California Business and Professions Code sections 1 2 475(a)(2), 480(a), and 10177(b).

4 These proceedings are brought under the provisions of 5 Section 10100, Division 4 of the Business and Professions Code 6 of the State of California and Sections 11500 through 11528 of 7 the California Government Code.

6.

8 WHEREFORE, the Complainant prays that the aboveentitled matter be set for hearing and, upon proof of the 9 charges contained herein, that the Commissioner refuse to 10 authorize the issuance of, and deny the issuance of, a real 11 estate salesperson license to Respondent, BRADLEY RONALD FOX, 12 and for such other and further relief as may be proper under 13 other applicable provisions of law. 14

2014.

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Dated at Los Angeles, California: <u>Hugust</u> Robin Trujillo

Deputy Real Estate VCommissioner

cc: BRADLEY RONALD FOX Robin Trujillo Sacto

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