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FILED

JUL 15 2015

BUREAU OF REAL ESTATE

BY *[Signature]*

9 BEFORE THE BUREAU OF REAL ESTATE

10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Application of)	No. H- 39913 LA
)	
13 DANIELLE NICOLE WILLARD,)	<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 DANIELLE NICOLE WILLARD
18 (“Respondent”), is informed and alleges as follows:

19 1.

20 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
21 State of California, alleges this Statement of Issues in her official capacity.

22 2.

23 On or about August 27, 2013, Respondent made application to the Bureau of
24 Real Estate of the State of California for a real estate salesperson license.

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Statement of Issues of Danielle Nicole Willard

1 FIRST CAUSE FOR DENIAL

2 (CRIMINAL CONVICTION)

3 3.

4 On or about September 20, 2000, Respondent pled nolo contendere and was
5 convicted in the Superior Court of California, County of Los Angeles, Case No. GA043098, for
6 violation of California Penal Code Section 487(a) (Grand Theft), a felony. Respondent was
7 placed on three years of formal probation, and ordered to serve 30 days in jail and pay
8 restitution. Additionally, Respondent was ordered to complete 200 hours of community
9 service.

10 4.

11 The conviction described in Paragraph 3 is an act which bears a substantial
12 relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the
13 qualifications, functions or duties of a real estate licensee.

14 5.

15 The conduct underlying the conviction described in Paragraph 3 above involves
16 dishonesty, fraud, or deceit, which constitutes cause for denial of Respondent's application for a
17 real estate license under Business and Professions Code Sections 475(a)(3), 480(a)(2), and
18 10177(j).

19 SECOND CAUSE FOR DENIAL

20 (FAILURE TO REVEAL CONVICTION ON LICENSE APPLICATION)

21 6.

22 In response to Part D, Question 1, under the Background Information section of
23 her license application, to wit, "HAVE YOU EVER BEEN CONVICTED OF ANY
24 VIOLATION OF THE LAW? ALL STATE AND FEDERAL MISDEMEANOR AND
25 FELONY CONVICTIONS, AND ALL MILITARY AND FOREIGN CONVICTIONS, MUST
26 BE DISCLOSED. CONVICTIONS EXPUNGED UNDER PENAL CODE SECTION 1203.4
27

Statement of Issues of Danielle Nicole Willard

1 OR A SIMILAR STATUTE MUST STILL BE DISCLOSED," Respondent answered "YES,"
2 but failed to disclose the conviction described in Paragraph 3, above.

3 7.

4 Respondent's failure to reveal this conviction, as set forth in Paragraph 3 above,
5 in her license application constitutes an attempt to procure a real estate license by fraud,
6 misrepresentation, or deceit, or by making a false statement of material fact required to be
7 revealed in said application, which is grounds for denial of the issuance of a license under
8 California Business and Professions Code Sections 475(a)(1), 480(d), and 10177(a).

9 8.

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

13 WHEREFORE, the Complainant prays that the above-entitled matter be set for
14 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
15 authorize the issuance of, and deny the issuance of, a real estate salesperson license to
16 Respondent DANIELLE NICOLE WILLARD and for such other and further relief as may be
17 proper under other applicable provisions of law.

18
19 Dated at San Diego, California

20 this 10th day of July, 2015

21
22 
23 Veronica Kilpatrick
24 Supervising Special Investigator

25
26 cc: DANIELLE NICOLE WILLARD
27 Veronica Kilpatrick
Sacto.

Statement of Issues of Danielle Nicole Willard