

FILED

OCT 11 2016

BUREAU OF REAL ESTATE

By *Carol Elouie*

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8
9 BEFORE THE BUREAU OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Application of) No. H-40422 LA
13 LISA CARO,) STATEMENT OF ISSUES
14 Respondent.)
15)

16 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
17 of California, for Statement of Issues against LISA CARO, a.k.a. LISA MARIA CARO,
18 a.k.a. LISA MARIE CARO, a.k.a. LISA KEENE, a.k.a. LISA HOPKINS, a.k.a. LISA
19 CAROKEENE, a.k.a. LISA HODGINS ("Respondent"), is informed and alleges as follows:

20 1.

21 The Complainant, Maria Suarez, acting in her official capacity as a Supervising
22 Special Investigator of the State of California, makes this Statement of Issues against LISA
23 CARO.

24 2.

25 On or about June 3, 2013, Respondent made application to the Bureau of Real
26 Estate of the State of California for a real estate salesperson license.

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Statement of Issues of Lisa Caro

1 FIRST CAUSE FOR DENIAL

2 (CRIMINAL CONVICTIONS)

3 3.

4 On or about October 27, 1986, Respondent pled guilty and was convicted in the
5 Municipal Court of California, County of Los Angeles, Case No. M304480, for violation of
6 California Business and Professions Code Section 25662 (Possession By Person Under 21
7 Years Of Age In Public Place), a misdemeanor. Respondent was ordered to pay fines and fees.

8 4.

9 On or about December 24, 1998, Respondent was convicted in the Superior
10 Court of California, County of Los Angeles, Case No. YA038882, for violation of California
11 Health and Safety Code Section 11377(a) (Possession Of Controlled Substance), a felony.
12 Respondent was placed on 36 months of formal probation, and ordered to serve 16 months in
13 prison suspended. Additionally, Respondent was ordered to enroll in a one year residential
14 drug treatment program. On or about June 11, 1999, the Court found Respondent in violation
15 of probation and probation was revoked. On or about June 6, 2000, Respondent admitted to
16 violation of probation, the Court found Respondent in violation of probation, probation was
17 reinstated, and Respondent was ordered to serve 90 days in jail.

18 5.

19 On or about April 9, 1999, Respondent pled nolo contendere and was convicted
20 in the Municipal Court of California, County of Los Angeles, Case No. 8SB04854, for violation
21 of California Health and Safety Code Section 11550(a) (Use Of Controlled Substance), a
22 misdemeanor. Respondent was placed on two years of summary probation, and ordered to
23 serve 180 days in jail suspended. Additionally, Respondent was ordered to complete 90 days at
24 Serenity House and Respondent's Driver's License was suspended for six months. On or about
25 June 3, 1999, probation was revoked. On or about June 22, 2000, probation was reinstated and
26 Respondent was ordered to serve 90 days in jail.

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1 6.

2 On or about April 28, 1999, Respondent pled nolo contendere and was convicted
3 in the Municipal Court of California, County of Los Angeles, Case No. 8SB04460, for violation
4 of California Penal Code Section 485 (Appropriation Of Lost Property By Finder), a
5 misdemeanor, and Vehicle Code Section 14601.1(a) (Driving When Privilege Suspended Or
6 Revoked), a misdemeanor. Respondent was placed on 36 months of summary probation, and
7 ordered to serve 360 days in jail suspended and 90 days in jail. On or about June 3, 1999,
8 probation was revoked. On or about October 25, 1999, probation was reinstated.

9 7.

10 On or about April 28, 1999, Respondent pled nolo contendere and was convicted
11 in the Municipal Court of California, County of Los Angeles, Case No. 8SB04465, for violation
12 of California Penal Code Section 470 (Forgery), a misdemeanor, and Penal Code Section 853.7
13 (Willful Violation Of Written Promise To Appear), a misdemeanor. Respondent was placed on
14 36 months of summary probation, and ordered to serve 180 days in house arrest. On or about
15 June 3, 1999, probation was revoked. On or about June 7, 2000, probation was reinstated.

16 8.

17 On or about May 19, 2005, Respondent pled guilty and was convicted in the
18 Superior Court of California, County of Los Angeles, Case No. 5SB03182, for violation of
19 California Vehicle Code Section 12500(a) (Unlawful To Drive Unless Licensed), a
20 misdemeanor. Respondent was placed on two years of summary probation, and ordered to pay
21 restitution, fines and fees. On or about October 12, 2005, Respondent admitted to violation of
22 probation. On or about May 25, 2006, the Court found Respondent in violation of probation
23 and probation was revoked. On or about November 8, 2006, probation was reinstated. On or
24 about December 15, 2006, probation was revoked. On or about December 19, 2006, the Court
25 found Respondent in violation of probation, probation was reinstated, and Respondent was
26 ordered to serve 180 days in jail.

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Statement of Issues of Lisa Caro

1 9.

2 On or about October 12, 2005, Respondent pled nolo contendere and was
3 convicted in the Superior Court of California, County of Los Angeles, Case No. 5SB07178, for
4 violation of California Penal Code Section 12020 (Possession Of Weapon), a misdemeanor.
5 Respondent was placed on 36 months of summary probation, and ordered to pay fines and fees.
6 On or about October 19, 2006, probation was revoked. On or about November 8, 2006,
7 probation was reinstated. On or about December 15, 2006, probation was revoked. On or
8 about December 19, 2006, Respondent admitted to violation of probation, the Court found
9 Respondent in violation of probation, probation was reinstated, and Respondent was ordered to
10 serve eight days in jail.

11 10.

12 On or about June 26, 2006, Respondent pled nolo contendere and was convicted
13 in the Superior Court of California, County of Los Angeles, Case No. YA064327, for violation
14 of California Health and Safety Code Section 11366 (Maintaining Place For Trafficking In
15 Controlled Substances), a misdemeanor. Respondent was placed on three years of summary
16 probation, and ordered to serve one day in jail and pay fines and fees. On or about
17 December 15, 2006, probation was revoked. On or about December 19, 2006, the Court found
18 Respondent in violation of probation, probation was reinstated, and Respondent was ordered to
19 serve an additional 180 days in jail.

20 11.

21 The convictions described in Paragraphs 3 through 10 bear a substantial
22 relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the
23 qualifications, functions or duties of a real estate licensee.

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1 12.

2 The crimes of which Respondent was convicted, as described in Paragraphs 3
3 through 10 above, constitute cause for denial of Respondent's application for a real estate
4 license under Business and Professions Code Sections 475(a)(2)-(3), 480(a)(1)-(2), and
5 10177(b).

6 SECOND CAUSE FOR DENIAL

7 (FAILURE TO REVEAL CONVICTIONS ON LICENSE APPLICATION)

8 13.

9 In response to Part D, Question 1, under the Background Information section of
10 her license application, to wit, "HAVE YOU EVER BEEN CONVICTED OF ANY
11 VIOLATION OF THE LAW? ALL STATE AND FEDERAL MISDEMEANOR AND
12 FELONY CONVICTIONS, AND ALL MILITARY AND FOREIGN CONVICTIONS, MUST
13 BE DISCLOSED. CONVICTIONS EXPUNGED UNDER PENAL CODE SECTION 1203.4
14 OR A SIMILAR STATUTE MUST STILL BE DISCLOSED," Respondent answered "NO,"
15 and failed to disclose the convictions described in Paragraphs 3 through 10 above.

16 14.

17 Respondent's failure to reveal these convictions, as set forth in Paragraphs 3
18 through 10 above, in her license application constitutes an attempt to procure a real estate
19 license by fraud, misrepresentation, or deceit, or by making a false statement of material fact
20 required to be revealed in said application, which is grounds for denial of the issuance of a
21 license under California Business and Professions Code Sections 475(a)(1), 480(d), and
22 10177(a).

23 15.

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

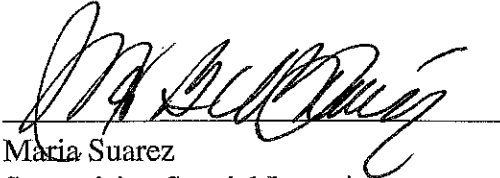
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WHEREFORE, the Complainant prays that the above-entitled matter be set for hearing and, upon proof of the charges contained herein, that the Commissioner refuse to authorize the issuance of, and deny the issuance of, a real estate salesperson license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

Dated at Los Angeles, California

this 10th day of October, 2016.



Maria Suarez
Supervising Special Investigator

cc: LISA CARO
Maria Suarez
Sacto.