

1 ANDREA BENTLER, Counsel (SBN 319369)
2 Department of Real Estate
3 320 West 4th Street, Suite 350
4 Los Angeles, California 90013-1105
5 Telephone: (213) 576-6982
6 Direct: (213) 576-6905
7 Fax: (213) 576-6917
8 *Attorney for Complainant*

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DEPT. OF REAL ESTATE
By 

9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Application of) No. H-41154 LA
13 BRENT DAVID MUSSON,) 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 BRENT DAVID MUSSON (“Respondent”), is
18 informed and alleges in her official capacity as follows:

19 1.

20 On or about January 12, 2017, Respondent made application to the Bureau of
21 Real Estate (“Bureau”)¹ of the State of California for a real estate salesperson license.

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26 _____
27 ¹ Between July 1, 2013 and July 1, 2018, the Department of Real Estate was known as the Bureau of Real Estate.

1 FIRST CAUSE FOR DENIAL

2 (DISCIPLINARY ACTION)

3 2.

4 On or about February 10, 2006, in Case No. S2004-435, the Registrar of
5 Contractors, of the Contractors State License Board, ordered Respondent's contractor's license
6 revoked, effective March 16, 2006. As stated more fully in the Accusation, filed November 8,
7 2005, by the Contractors' State License Board, the Contractor's State License Board found that
8 Respondent had committed numerous violations of law, including violation of California
9 Business and Professions Code section 7107 (abandonment), violation of California Business
10 and Professions Code section 7109(a) (departure from accepted trade standards), violation of
11 California Business and Professions Code section 7113 (failure to complete the project for
12 price stated in the contract), violation of California Business and Professions Code section 7110
13 (failed to provide workers' compensation insurance), and violation of California Business and
14 Professions Code section 7159(e-f) (violations of home improvement contract form). In the
15 Default Decision of the Registrar, the Registrar of Contractors found that respondent had
16 committed acts constituting grounds for disciplinary action under Business and Professions
17 Code. As per a letter from the Contractor's State License Board to Respondent, dated February
18 14, 2013, Respondent was required to pay \$31,959.00 in restitution to reapply for a contractor's
19 license.

20 3.

21 The allegations set forth in Paragraph 2 above constitutes cause under Code §§
22 10177(f) and 10177(j) for the denial of a license to Respondent.

23 4.

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

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1 SECOND CAUSE FOR DENIAL

2 (CRIMINAL CONVICTIONS)

3 5.

4 On or about November 17, 2014, in the Superior Court of California, County of
5 Los Angeles, Case No. 0PS00835, Respondent was convicted on a plea of nolo contendere for
6 violation of Vehicle Code section 20002(a) (hit and run), a misdemeanor. Respondent was
7 placed on summary probation for 2 years on certain terms and conditions, including 1 day in
8 Los Angeles County Jail, and payment of fines and assessments.

9 6.

10 On or about October 8, 1992, in the Superior Court of California, County of Los
11 Angeles, Case No. 92M74103, Respondent was convicted on a plea of nolo contendere for
12 violation of Penal Code section 12031(a) (carry a loaded firearm: public place), a
13 misdemeanor. Respondent was placed on summary probation for 2 years on certain terms and
14 conditions, including 10 days in Los Angeles County Jail.

15 7.

16 On or about August 9, 1991, in the Superior Court of California, County of Los
17 Angeles, Case No. 91M02881, Respondent was convicted on a plea of nolo contendere for
18 violation of Vehicle Code section 31 (false information to a peace officer), a misdemeanor.
19 Respondent was placed on summary probation for 1 year on certain terms and conditions,
20 including payment of a fine and an assessment.

21 8.

22 The crimes of which Respondent was convicted as described in Paragraphs 5-7
23 above, by their facts and circumstances, bears a substantial relationship under Section 2910,
24 Title 10, Chapter 6, California Code of Regulations to the qualifications, functions or duties of a
25 real estate licensee.

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1 9.

2 The crimes of which Respondent was convicted, as described in Paragraphs 5-7
3 above, constitute cause for denial of Respondent's application for a real estate license under
4 California Business and Professions Code sections 480(a)(1) and 10177(b).

5 10.


6 These proceedings are brought under the provisions of Section 10100, Division
7 4 of the Business and Professions Code of the State of California and Sections 11500 through
8 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 BRENT DAVID MUSSON and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California this 13th day of September, 2018.



Maria Suarez
Supervising Special Investigator

cc: BRENT DAVID MUSSON
Maria Suarez
Sacto.