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FILED
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DEPT. OF REAL ESTATE
By- [REDACTED]

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Application of
12 BILLEY LEROY DOOLEY, JR.,
13 Respondent.

DRE No. H-42886 LA

STATEMENT OF ISSUES

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15 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator for the
16 Department of Real Estate of the State of California, brings this Statement of Issues in her
17 official capacity against BILLEY LEROY DOOLEY, JR., (“Respondent”), is informed and
18 alleges as follows:

19 1. All references to the “Code” are to the California Business and Professions Code,
20 all references to the “Real Estate Law” are to Part 1 of Division 4 of the Code, and all references
21 to “Regulations” are to Title 10, Chapter 6, of the California Code of Regulations.

22 STATEMENT OF FACTS

23 2. Respondent made application to the Department for a real estate salesperson
24 license on or about February 8, 2024.

1 Cause for Denial – Felony Conviction

2 3. On or about May 22, 2014, before the Circuit Court of the County of Chesterfield,
3 Commonwealth of Virginia, Case Numbers CR14F00329-01, CR14F00329-02, and
4 CR14F00329-03, Respondent was found guilty and convicted of violating one count of Virginia
5 Code section 182.2-186 (false statement to obtain credit), and two counts of Virginia Code
6 section 18.2-186.3 (identity theft/fraud), all felonies.

7 4. The convictions alleged above in Paragraph 3, and the circumstances surrounding
8 said convictions, are substantially related to the qualifications, functions, or duties of a real estate
9 licensee under the California Code of Regulations, Title 10, Chapter 6, sections 2910 and 2910.5.

10 5. The crimes of which Respondent was convicted, as alleged above in Paragraph 3,
11 constitute cause for the denial of Respondent's application for a real estate salesperson license
12 pursuant to Business and Professions Code sections 475(a)(2), 480, and 10177(b).

13 6. These proceedings are brought under the provisions of Section 10100, Division 4
14 of the Business and Professions Code of the State of California and Sections 11500 through
15 11528 of the California Government Code.

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

20 Dated May 14, 2024 at San Diego, California.

21 
22 VERONICA KILPATRICK
23 Supervising Special Investigator

24 cc: Billey Leroy Dooley, Jr.,
Veronica Kilpatrick
Sacto.