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FILED
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DEPARTMENT OF REAL ESTATE
By K. Krapp

7
8 BEFORE THE BUREAU OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Application of:)
12 ANNA LISA ORDONEZ,) No. H-3174 FR
13 Respondent.) STATEMENT OF ISSUES
14)

15 The Complainant, BRENDA SMITH, in her official capacity as a Supervising
16 Special Investigator of the State of California, brings this Statement of Issues against ANNA
17 LISA ORDONEZ ("Respondent") and is informed and alleges as follows:

18 1

19 On or about May 8, 2017, Respondent made application to the Bureau of Real
20 Estate of the State of California ("Bureau") for a real estate salesperson license.

21 FAILURE TO DISCLOSE CONVICTIONS

22 2

23 In response to Question 28 of said application, to wit: "HAVE YOU EVER
24 BEEN CONVICTED (SEE PARAGRAPH ABOVE) OF ANY VIOLATION OF THE LAW
25 AT THE MISDEMEANOR OR FELONY LEVEL? IF YES, PLEASE COMPLETE ITEM 34
26 WITH INFORMATION ON EACH CONVICTION...", Respondent concealed and failed to
27 disclose the conviction described below in Paragraph 4.

1 CRIMINAL CONVICTIONS

2 3

3 On or about September 19, 2013, in the Superior Court of the State of California,
4 County of San Benito, Case No. CR12-00052, Respondent was convicted of violating California
5 Penal Code Section 273a(b) (willful cruelty to child), a misdemeanor and a crime that bears a
6 substantial relationship under Section 2910, Title 10 of the California Code of Regulations
7 (“Regulations”) to the qualifications, functions, or duties of a real estate licensee.

8 4

9 On or about August 4, 2009, in the Superior Court of the State of California,
10 County of San Benito, Case No. CR09-01435, Respondent was convicted of violating California
11 Vehicle Code Section 14601.2(a) (driving on a suspended license), a misdemeanor and a crime
12 that bears a substantial relationship under Section 2910 of the Regulations to the qualifications,
13 functions, or duties of a real estate licensee.

14 5

15 On or about December 23, 2008, in the Superior Court of the State of California,
16 County of San Benito, Case No. CR-0802750, Respondent was convicted of violating California
17 Vehicle Code Sections 23152(b) (driving under the influence) and 14601.1(a) (driving on a
18 suspended license), misdemeanors and crimes that bear a substantial relationship under Section
19 2910 of the Regulations to the qualifications, functions, or duties of a real estate licensee.

20 GROUND FOR DENIAL


21 6

22 The facts alleged in Paragraph 2 and 4, above, constitute grounds for denial of
23 Respondent’s application for a real estate salesperson license under Business and Professions
24 Code (“Code”) Sections 480(d) and 10177(a) (attempt to procure a real estate license by fraud,
25 misrepresentation, or deceit, or by making a material misstatement of fact in an application for a
26 real estate license).

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The facts alleged in Paragraphs 3 through 5, above, constitute grounds for denial of Respondent's application for a real estate salesperson license under Sections 480(a) (conviction of a crime) and 10177(b) (conviction of crime substantially related to the qualifications, functions, or duties of a real estate licensee) of the Code.

WHEREFORE, 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, and for such other and further relief as may be proper under other provisions of law.


BREND A SMITH
Supervising Special Investigator

Dated at Fresno, CA

this 20 day of June, 2018.

DISCOVERY DEMAND

Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the Bureau of Real Estate hereby makes demand for discovery pursuant to the guidelines set forth in the *Administrative Procedure Act*. Failure to provide Discovery to the Bureau of Real Estate may result in the exclusion of witnesses and documents at the hearing or other sanctions that the Office of Administrative Hearings deems appropriate.