

FILED

OCT 13 2014

BUREAU OF REAL ESTATE

By S. Black

1 TRULY SUGHRUE, Counsel
 2 State Bar No. 223266
 3 Bureau of Real Estate
 4 P.O. Box 137007
 5 Sacramento, CA 95813-7007
 6
 7 Telephone: (916) 263-8672
 8 (916) 263-8676 (Direct)

BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

* * *

11 In the Matter of the Application of)
 12 RENE SANCHEZ,)
 13 Respondent.)

No. H-2915 FR

STATEMENT OF ISSUES

14
 15 The Complainant, BRENDA SMITH, a Deputy Real Estate Commissioner of the
 16 State of California, for Statement of Issues against RENE SANCHEZ ("Respondent"), is
 17 informed and alleges as follows:

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 19 Complainant, BRENDA SMITH, a Deputy Real Estate Commissioner
 20 of the State of California, makes this Statement of Issues in her official capacity.

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21
 22 Respondent made application to the Bureau of Real Estate of the State of
 23 California for a real estate salesperson license on or about August 16, 2013.

3

24
 25 On or about July 11, 2000, in the Superior Court of the State of California,
 26 County of Fresno, Respondent was convicted of violating Section 23152(b) of the California
 27 Vehicle Code (driving under the influence), a misdemeanor and crime that bears a substantial

1 relationship under Section 2910, Title 10, Chapter 6 of the California Code of Regulations (the
2 Regulations), to the qualifications, functions, or duties of a real estate licensee.

3 4

4 On or about April 4, 2001, in the Superior Court of the State of California, County
5 of Fresno, Respondent was convicted of violating Section 23152(b) of the California Vehicle
6 Code (driving under the influence), a misdemeanor and crime that bears a substantial relationship
7 under Section 2910 of the Regulations, to the qualifications, functions, or duties of a real estate
8 licensee.

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10 On or about March 29, 2005, in the Superior Court of the State of California,
11 County of Fresno, Respondent was convicted of violating Section 11364 of the California Health
12 and Safety Code (possession of drug paraphernalia), a misdemeanor and crime that bears a
13 substantial relationship under Section 2910 of the Regulations, to the qualifications, functions, or
14 duties of a real estate licensee.

15 5


16 On or about December 20, 2006, in the Superior Court of the State of California,
17 County of Fresno, Respondent was convicted of violating Section 487(a) of the California Penal
18 Code (grand theft of personal property) and Section 19706 of the California Revenue and
19 Taxation Code (tax evasion), misdemeanors and crimes that bear a substantial relationship under
20 Section 2910 of the Regulations, to the qualifications, functions, or duties of a real estate
21 licensee.

22 6

23 On or about December 20, 2006, in the Superior Court of the State of California,
24 County of Fresno, Respondent was convicted of violating Section 23152(a) of the California
25 Vehicle Code (driving under the influence), a misdemeanor and crime that bears a substantial
26 relationship under Section 2910 of the Regulations, to the qualifications, functions, or duties of a
27 real estate licensee.

The crimes of which Respondent was convicted, as alleged above, constitute cause for denial of Respondent's application for a real estate license under Sections 480(a) and 10177(b) of the California Business and Professions Code.

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


BRENDA SMITH
Deputy Real Estate Commissioner

Dated at Fresno, California,
this 9 day of October, 2014.

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.