

KYLE T. JONES, Counsel (SBN 300751)
Department of Real Estate
P.O. BOX 137007
Sacramento, CA 95813-7007

Telephone: (916) 576-8700
(916) 263-3767 (Fax)
(916) 576-7840 (Direct)



BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Application of)	
)	NO. H-3448 FR
TRISHA JOYCE LANE,)	
)	<u>STATEMENT OF ISSUES</u>
Respondent.)	
)	

The Complainant, BRENDA SMITH, acting in her official capacity as a
Supervising Special Investigator of the State of California, for this Statement of Issues against
TRISHA JOYCE LANE ("Respondent"), is informed and alleges as follows:

1

On or about December 3, 2021, Respondent made application to the Department
of Real Estate of the State of California for a real estate salesperson license.

2

On or about May 10, 2017, in the Superior Court of the State of California,
County of Kern, Case No. BM899408A, Respondent was convicted of violating Sections
20002(a) (hit and run) and 23152(a) (driving under the influence) of the California Vehicle Code,
misdemeanors and crimes that bear a substantial relationship to the qualifications, functions or
duties of a real estate licensee pursuant to Section 2910, Title 10, of the California Code of
Regulations ("Regulations").

On or about February 27, 2017, in the Superior Court of the State of California, County of Kern, Case No. BM900105A, Respondent was convicted of violating Section 20002(a) of the California Vehicle Code, a misdemeanor and a crime that bears a substantial relationship to the qualifications, functions or duties of a real estate licensee pursuant to Section 2910 of the Regulations.

MATTERS IN AGGRAVATION

On or about May 10, 2017, in the Superior Court of the State of California, County of Kern, Case No. BF167291A, Respondent was convicted of violating Section 20001(a) (hit and run involving injury) of the California Vehicle Code.

On or about March 2, 2007, in the Superior Court of the State of California, County of Kern, Case No. BM703268A, Respondent was convicted of violating Section 23153(a) (driving under the influence and causing bodily injury) of the California Vehicle Code, a misdemeanor.

GROUND FOR DENIAL

Respondent's criminal convictions described above in Paragraphs 2 and 3 constitute cause for denial of Respondent's application for a real estate salesperson license pursuant to the provisions of Sections 480(a)(1) (conviction of crime), 10177(b) (conviction of crime), and 10177(j) (engaged in conduct that constitutes fraud or dishonest dealing) 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/broker license to

///

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



BRENDA SMITH

Supervising Special Investigator

Dated at Fresno, California,
this 22 day of September, 2022.

DISCOVERY DEMAND

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