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DEPARTMENT OF REAL ESTATE

By R. dew

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BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Application of)
ANGEL MANUEL JIMENEZ,) NO. H-3475 FR
Respondent.) STATEMENT OF ISSUES

The Complainant, BRENDA SMITH, a Supervising Special Investigator of the State of California, for Statement of Issues in her official capacity against ANGEL MANUEL JIMENEZ (Respondent), is informed and alleges as follows:

1

On or about October 4, 2021, the Department of Real Estate of the State of California (Department) received Respondent's license application for a real estate salesperson license.

2

On or about November 4, 2016, in the United States District Court, Southern District of California, Case No. 16CR1358-LAB, Respondent was convicted of violating Title 21, United States Code, Sections 952 and 960 (Importation of Methamphetamine), a felony and/or crime which bears a substantial relationship under Section 2910, Title 10, Chapter 6,

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1 California Code of Regulations (Regulations), to the qualifications, functions or duties of a real
2 estate licensee.

3 3

4 Respondent's criminal conviction, described in paragraph 2, above, constitutes
5 cause for denial of Respondent's application for a real estate salesperson license pursuant to the
6 provisions of Sections 480 (a) and 10177 (b) (Conviction of Crime) of the Business and
7 Professions Code (Code).

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

13 
14 BREND A SMITH
15 Supervising Special Investigator

16 Dated at Fresno, California,
17 this 25 day of January 2023.

18
19 DISCOVERY DEMAND

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