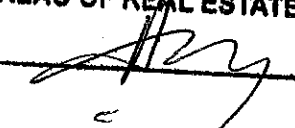


FILED

MAY 11 2015

BUREAU OF REAL ESTATE

By 

STEVE CHU, Counsel (SBN 238155)
Bureau of Real Estate
320 West 4th Street, Suite 350
Los Angeles, California 90013-1105

Telephone: (213) 620-6430
Fax: (213) 576-6917

**BEFORE THE BUREAU OF REAL ESTATE
STATE OF CALIFORNIA**

* * *

In the Matter of the Application of	)	No. H- 04718 SD
	)	
DAVID WHEELER RUDOLPH,	)	<u>STATEMENT OF ISSUES</u>
	)	
Respondent.	)	
	)	

The Complainant, Veronica Kilpatrick, a Deputy Real Estate Commissioner of the State of California, for Statement of Issues against DAVID WHEELER RUDOLPH ("Respondent"), is informed and alleges in her official capacity as follows:

1.

The Complainant, Veronica Kilpatrick, a Deputy Real Estate Commissioner of the State of California, alleges this Statement of Issues in her official capacity.

2.

On or about August 25, 2014, Respondent made application to the Bureau of Real Estate of the State of California for a real estate salesperson license.

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Statement of Issues of David Wheeler Rudolph

3.

On or about August 24, 2009, Respondent pled guilty and was convicted in the Circuit Court of the Eighteenth Judicial Circuit, Du Page County, Illinois, Case No. 08 CF 2914-01, for violation of the 720 Illinois Compiled Statutes 550/5(f) (Possession Of Cannabis With Intent To Deliver), a felony. Respondent was ordered to serve six years in prison and pay fines.

4.

The conviction described in Paragraph 3 bears a substantial relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real estate licensee.

5.

The crime of which Respondent was convicted, as described in Paragraph 3 above, constitutes cause for denial of Respondent's application for a real estate license under Business and Professions Code Sections 475(a)(2)-(3), 480(a)(1)-(2), and 10177(b).

6.

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

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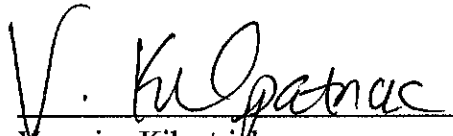
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Statement of Issues of David Wheeler Rudolph

1 WHEREFORE, the Complainant prays that the above-entitled matter be set for
2 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
3 authorize the issuance of, and deny the issuance of, a real estate salesperson license to
4 Respondent DAVID WHEELER RUDOLPH and for such other and further relief as may be
5 proper under other applicable provisions of law.
6

7 Dated at San Diego, California

8 this 7th day of May, 20 15

9
10 
11 Veronica Kilpatrick
12 Deputy Real Estate Commissioner
13

14 cc: DAVID WHEELER RUDOLPH
15 Veronica Kilpatrick
16 Sacto.
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Statement of Issues of David Wheeler Rudolph