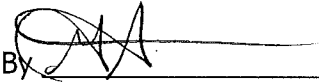


FILED

February 16, 2012

1 RICHARD K. UNO, Counsel (SBN 98275)
2 Department of Real Estate
3 P. O. Box 187007
4 Sacramento, CA 95818-7007

DEPARTMENT OF REAL ESTATE

By 

4 Telephone: (916) 227-0789
5 (916) 227-2380 (Direct)

6
7
8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Application of)

12 SHAWNEE MARIE TALLEY,)

13 Respondent.)

No. H-5781 SAC

STATEMENT OF ISSUES

14
15 The Complainant, TRICIA D. SOMMERS, a Deputy Real Estate Commissioner
16 of the State of California, for Statement of Issues against SHAWNEE MARIE TALLEY,
17 (herein "Respondent"), alleges as follows:

18 1

19 Complainant makes this Statement of Issues in her official capacity.

20 2

21 On or about June 15, 2011, Respondent made application to the Department of
22 Real Estate of the State of California (herein "the Department") for a real estate salesperson
23 license.

24 3

25 On or about October 15, 2003 in the Superior Court of the State of California,
26 County of Napa, Case No. CR 115135, Respondent was convicted of violating Section
27 14601.1(a) of the California Vehicle Code (Driving With Suspended License, w/Prior), a

1 misdemeanor and a crime that bears a substantial relationship under Section 2910, Title 10 of
2 the California Code of Regulations, (herein Regulations), to the qualifications, functions or
3 duties of a real estate licensee.

4 4

5 On or about June 29, 2001 in the Superior Court of the State of California,
6 County of Solano, Case No. FCR 189535, Respondent was convicted of violating Section
7 11377(a) of the California Health and Safety Code (Possession of a Controlled Substance), a
8 felony that bears a substantial relationship under Section 2910 of the Regulations, to the
9 qualifications, functions or duties of a real estate licensee.

10 5

11 On or about June 29, 2001, in the Superior Court of the State of California,
12 County of Solano, Case No. FCR 188108, Respondent was convicted of violating Section
13 10851(a) of the California Vehicle Code (Taking Vehicle Without Owners Permission), a felony
14 and a crime that bear a substantial relationship under Section 2910 of the Regulations, to the
15 qualifications, functions or duties of a real estate licensee.

16 6

17 On or about May 4, 2001, in the Superior Court of the State of California,
18 County of Napa, Case Number DKT 0255105, Respondent was convicted of violating Section
19 14601 of the California Vehicle Code (Driving With a Suspended License), a misdemeanor and
20 a crime that bears a substantial relationship under Section 2910 of the Regulations, to the
21 qualifications, functions or duties of a real estate licensee.

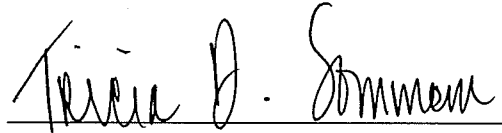
22 7

23 Respondent's criminal convictions, as set out in Paragraphs 3 through 6, above,
24 constitute cause for denial of Respondent's application for a real estate salesperson license
25 pursuant to the provisions of Sections 480(a) (Conviction of Crime) and 10177(b) (Further
26 Grounds for Disciplinary Action-Conviction of Crime) of the Code.

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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 in the premises.



TRICIA D. SOMMERS
Deputy Real Estate Commissioner

Dated at Sacramento, California,
this 15th day of February, 2012.