1	KATHY YI, Counsel (SBN 236736) Department of Real Estate		
2	Department of Real Estate 320 West 4th Street, Suite 350		
3	Los Angeles, California 90013-1105 Telephone: (213) 576-6982  December 27, 2023		
4	Direct: (213) 576-6940 Department of Real Estate		
5	Attorney for Complainant  By All Survey Surv		
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8	BEFORE THE DEPARTMENT OF REAL ESTATE		
9	STATE OF CALIFORNIA		
10	* * *		
11	In the Matter of the Application of ) No. H-05800 SD		
12	SADE EUGENIE DEBORAH IRENE HENEGAN, ) <u>STATEMENT OF ISSUES</u>		
13	Respondent.		
14			
15			
16	The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of		
17	California, for Statement of Issues against SADE EUGENIE DEBORAH IRENE HENEGAN,		
18	a.k.a. "Sade Eugenie Deborahirene Henegan," "Sade Eugenie Henegan," "Sade E. Henegan,"		
19	and "Sade Henegan" ("Respondent"), is informed and alleges in her official capacity as		
20	follows:		
21	1.		
22	On or about May 30, 2023, Respondent made application to the Department of Real		
23	Estate of the State of California for a real estate salesperson license.		
24	(CRIMINAL CONVICTION)		
25	2.		
26	On or about January 6, 2020, in the Circuit Court of the Eighteenth Judicial Circuit of		
27	the Brevard County of Florida, Case No. 05-2019-CF-011420-AXXX-XX, Respondent was		
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1	convicted, upon no contest please, for violating Florida Statutes section 806.13(1)(b)(2)		
2	(criminal mischief over 200 less than 1000 dollars) and section 784.03 (battery), both		
3	misdemeanors. The court placed Respondent on probation for a period of six (6) months under		
4	the supervision of the Department of Corrections under certain terms, including no contact with		
5	the victim and completing four (4) hours of Anger Management Course.		
6	3.		
7	The crimes of which Respondent was convicted, as described in Paragraph 2 above, by		
8	their facts and circumstances, bear a substantial relationship under Section 2910, Title 10,		
9	Chapter 6, of the California Code of Regulations to the qualifications, functions or duties of a		
10	real estate licensee.		
11	4.		
12	The crimes of which Respondent was convicted, as described in Paragraph 2 above,		
13	constitute cause for denial of Respondent's application for a real estate license under California		
14	Business and Professions Code sections 475(a)(2), 480(a)(1) and 10177(b).		
15	5.		
16	These proceedings are brought under the provisions of Section 10100, Division 4 of the		
17	Business and Professions Code of the State of California and Sections 11500 through 11528 of		
18	the California Government Code.		
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1	WHEREFORE, the Complainant prays that the above-entitled matter be set for hearing		
2	and, upon proof of the charges contained herein, that the Commissioner refuse to authorize the		
3	issuance of, and deny the issuance of, a real estate salesperson license to Respondent SADE		
4	EUGENIE DEBORAH IRENE HENEGAN and for such other and further relief as may be		
5	proper under other applicable provisions of law.		
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7	Dated at San Diego, California, on	Dec 21, 2023	
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10		Veronica Kilpatrick	
11		Veronica Kilpatrick Supervising Special Investigator	
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15	Quantum Express Veronica Kilpatrick	INE HENEGAN	
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