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FILED
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DEPARTMENT OF REAL ESTATE
By R. Max

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8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

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12 In the Matter of the Application of)
13 DEBORAH ELIZABETH LEE,) H-5859 SAC
14 Respondent.) STATEMENT OF ISSUES
15)

16 The Complainant, TRICIA D. SOMMERS, in her official capacity as a Deputy
17 Real Estate Commissioner of the State of California, for Statement of Issues against
18 DEBORAH ELIZABETH LEE, (hereinafter "Respondent") is informed and alleges as follows:

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20 On or about December 12, 2011, Respondent made application to the
21 Department of Real Estate of the State of California for a real estate salesperson license.

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23 In response to Question 23 of said application, to wit: "Have you ever been
24 convicted of a misdemeanor or felony? Convictions expunged under Penal Code Section
25 1203.4 must be disclosed. However, you may omit minor traffic citations which do not
26 constitute a misdemeanor or felony offense", Respondent concealed and failed to disclose the
27 conviction described in Paragraph 4, below.

On or about April 7, 1993, in the Superior Court of the State of California, County of Shasta, Case No. CRF93-0004, Respondent was convicted of violating Section 11377(a) of the California Health and Safety Code (Unlawful Possession of Controlled Substance-Methamphetamine), and Section 11550(a) of the California Health and Safety Code (Under the Influence of Controlled Substance-Methamphetamine), both misdemeanors and crimes which bear a substantial relationship under Section 2910, Title 10, Chapter 6 of the California Code of Regulations (hereinafter "the Regulations") to the qualifications, functions or duties of a real estate licensee.

On or about April 7, 1993, in the Superior Court of the State of California, County of Shasta, Case No. CRM93-1222, Respondent was convicted of violating Section 647(g) of the California Penal Code (Loitering), a misdemeanor and a crime that bears a substantial relationship under Section 2910, Title 10 of the Regulations to the qualifications, functions or duties of a real estate licensee.

On or about August 16, 1993, in the Superior Court of the State of California, County of Shasta, Case No. CRM93-4618, Respondent was convicted of violating Section 484(a)/488 of the California Penal Code (Petty Theft), a misdemeanor and a crime that bears a substantial relationship under Section 2910, Title 10, of the Regulations to the qualifications, functions or duties of a real estate licensee.

On or about August 14, 1996, in the Superior Court of the State of California, County of Shasta, Respondent was convicted of violating Section 459 of the California Penal Code (Burglary), a misdemeanor and a crime that bears a substantial relationship under Section 2910, Title 10, of the Regulations to the qualifications, functions or duties of a real estate licensee.

On or about May 5, 1997, in the Superior Court of the State of California, County of Shasta, Case No. CRTR97-1017, Respondent was convicted of violating Section 14601(a) of the California Vehicle Code (Driving While License Suspended or Revoked), while admitting four (4) previous infraction convictions for the same, a misdemeanor and a crime that bears a substantial relationship under Section 2910, Title 10, of the Regulations to the qualifications, functions or duties of a real estate licensee.

On or about May 5, 1997, in the Superior Court of the State of California, County of Shasta, Case No. CRTR97-2295, Respondent was convicted of violating Section 14601(a) of the California Vehicle Code (Driving While License Suspended or Revoked), a misdemeanor and a crime that bears a substantial relationship under Section 2910, Title 10, of the Regulations to the qualifications, functions or duties of a real estate licensee.

MATTER IN AGGRAVATION

On or about August 10, 1995, in the Superior Court of the State of California, County of Shasta, Case No. CRM95-5802, Respondent was convicted of violating Section 484(a)/488 of the California Penal Code (Petty Theft), an infraction.

Respondent's failure to reveal in her application for a real estate salesperson license the conviction set forth in Paragraph 4, above, constitutes the procurement of or attempt to procure a real estate license by fraud, misrepresentation, or deceit, or by making a material misstatement of fact in said application, which failure is cause for denial of Respondent's application for a real estate salesperson license pursuant to the provisions of Sections 480(c) (Denial of License by Board – False Statement of Fact on Application) and 10177(a) (Further Grounds for Disciplinary Action – Attempted Procurement of License by

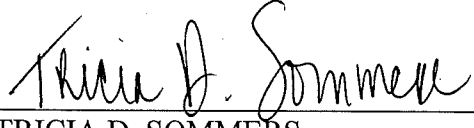
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1 Fraud/Misrepresentation/Deceit/Material Misstatement) of the California Business and
2 Professions Code (hereinafter "the Code").

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4 The facts alleged in Paragraphs 3 through 8, above, constitute cause for denial of
5 Respondent's application for a real estate license under Sections 480(a) (Denial of License by
6 Board – Conviction of Crime) and 10177(b) (Conviction of Crime Substantially Related to
7 Qualifications, Functions or Duties of Real Estate Licensee) of the Code.

8 WHEREFORE, Complainant prays that the above-entitled matter be set for
9 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
10 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 the provisions of law.

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14 TRICIA D. SOMMERS
15 Deputy Real Estate Commissioner

16 Dated at Sacramento, California,
17 this 5th day of August, 2012.