FILED

JUL 10 2013

BUREAU OF REAL ESTATE

By K. Contreras

BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Application of LAURA LYNN BRANDON, Respondent.	NO. H-5958 SAC OAH NO. 2013030174

ORDER DENYING RECONSIDERATION

On May 27, 2013, a Decision was rendered in the above-entitled matter to become effective June 18, 2013.

On June 5, 2013, Respondent LAURA LYNN BRANDON requested a stay for the purpose of filing a petition for reconsideration of the Decision of May 27, 2013, and the effective date was stayed to July 18, 2013.

I have given due consideration to the petition of Respondent LAURA LYNN BRANDON. I find no good cause to reconsider the Order of May 27, 2013, and reconsideration is hereby denied.

IT IS HEREBY ORDERED 7/9/2013.

REAL ESTATE COMMISSIONER

FILED

JUN -7 2013

DEPARTMENT OF REAL ESTATE

By K. Contreras

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Application of LAURA LYNN BRANDON, Respondent(s).	No. H-5958 SAC OAH No. 2013030174

ORDER STAYING EFFECTIVE DATE

On May 24, 2013, a Decision was rendered in the above-entitled matter to become effective on June 18, 2013 ("the Decision").

On June 5, 2013, Respondent requested a stay for the purpose of filing a petition for reconsideration of the Decision.

IT IS HEREBY ORDERED that the effective date of the Decision is stayed for a period of thirty (30) days, with a new effective date of 12 o'clock noon on July 18, 2013.

DATED: 6/7/2013

REAL ESTATE COMMISSIONER

Wayne S. Bell

FILED

MAY 28 2013

DEPARTMENT OF REAL ESTATE

By K. Contreras

BEFORE THE

DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Application of	)	
	)	NO. H-5958 SAC
LAURA LYNN BRANDON,	)	
	)	OAH NO. 2013030174
Respondent.	)	
	)	

DECISION

The Proposed Decision dated April 16, 2013, of the Administrative Law Judge of the Office of Administrative Hearings is hereby adopted as the Decision of the Real Estate Commissioner in the above-entitled matter.

The application for a real estate salesperson license is denied. There is no statutory restriction on when application may again be made for this license. If and when application is again made for this license, all competent evidence of rehabilitation presented by Respondent will be considered by the Real Estate Commissioner. A copy of the Commissioner's Criteria of Rehabilitation is appended hereto for the information of Respondent.

This Decision shall become effective at 12 o'clock noon on JUN 18 2013.

IT IS SO ORDERED May 27, 2013.

By: Jeffrey Mason
Chief Deputy Commissioner

BEFORE THE
DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Statement of Issues Against: LAURA LYNN BRANDON, Respondent.	Case No. H-5958 SAC OAH No. 2013030174

PROPOSED DECISION

Administrative Law Judge Coren D. Wong, Office of Administrative Hearings, State of California, heard this matter on April 8, 2013, in Sacramento, California.

Stephanie K. Sese, Real Estate Counsel, represented complainant Tricia D. Sommers, a Deputy Real Estate Commissioner of the State of California.

Respondent Laura Lynn Brandon represented herself.

Evidence was received, the record was closed, and the matter was submitted for decision on April 8, 2013.

SUMMARY

Complainant seeks to deny respondent's application for a real estate salesperson license on the grounds that she suffered the criminal convictions discussed below. Cause exists to deny her application. While respondent produced evidence of rehabilitation as discussed below, she did not demonstrate that she has adequately addressed the underlying motivation for her criminal conduct such that the Department can be assured she is fit for licensure at this time. Therefore, her application should be denied.

FACTUAL FINDINGS

1. On September 2, 1988, the Department of Real Estate (Department) issued Real Estate Salesperson License No. S/01000073 to respondent. That license was suspended two months later on the ground that respondent failed to disclose her prior petty theft conviction on her application. It was later revoked for the same reason, but she was issued a

restricted license, effective January 10, 1989. The restricted license was converted to an unrestricted license, effective February 4, 1992. Respondent allowed her license to expire on August 26, 1996.

2. Respondent applied to the Department for a real estate salesperson license on August 6, 2009. That application was denied based on the criminal convictions discussed below and her nondisclosure of the details of those convictions (as opposed to their existence) on the application. Her application for reconsideration was denied on May 19, 2011.

3. On June 6, 2012, respondent signed and submitted to the Department the application for a real estate salesperson that is the subject of this decision.

4. On February 21, 2013, complainant, acting solely in her official capacity, filed a Statement of Issues seeking to deny respondent's application based on the criminal convictions discussed below.

Criminal Convictions

5. On January 5, 2007, in the Superior Court of the State of California, in and for the County of Santa Cruz, respondent pled guilty to, and was convicted of, a misdemeanor violation of Vehicle Code section 23152, subdivision (b), driving a motor vehicle with a blood alcohol content of .08 percent or greater. Imposition of sentence was suspended, and respondent was placed on five years of probation. She was ordered to spend five days in the Santa Cruz County Jail and pay fines, penalties, and fees in the total sum of $2,015. She was also ordered to enroll in and complete the First Offender Drinking Driver Program.[1] Respondent completed her criminal probation on January 5, 2012.

6. The factual basis for respondent's conviction arose out of her September 2, 2006 arrest by the California Highway Patrol in Santa Cruz, California for drunk driving. Her blood alcohol content was .18 percent.

7. On November 27, 2002, in the Superior Court of the State of California, in and for the County of Sacramento, Case No. 02F09540, respondent pled nolo contendere to, and was convicted of, a misdemeanor violation of Vehicle Code section 2800.1, subdivision (a), evading a peace officer. Imposition of sentence was suspended, and respondent was placed on informal probation for three years. She was ordered to spend 90 days in the Sacramento County Jail, which was stayed pending her successful completion of a residential drug treatment program at Fair Oaks Recovery Center. On December 12, 2002, respondent's

[1] Complainant did not introduce the court records for this conviction. The details of the conviction were culled from the Proposed Decision issued in the Department's prior administrative action to deny respondent's application, which was admitted for all purposes, without objection, as part of Exhibit 5.

probation was revoked and a bench warrant for her arrest was issued because she did not complete the treatment program. The bench warrant was recalled and vacated on March 4, 2003, and the stay was lifted on the order requiring respondent to spend 90 days in the Sacramento County Jail.

8. The factual basis for respondent's conviction arose out of her November 9, 2002 encounter with officers from the Galt Police Department. That night, respondent was seen driving a truck with no tail lights. After an officer initiated a traffic stop, respondent stuck her head out the driver's window and said she was on her way to another Galt police officer's house. The officer instructed respondent to turn the ignition off; but she refused, repeated where she was going, and said people were "trying to get" her. The officer again instructed respondent to turn her ignition off, but she again refused and then drove away with the officer in pursuit.

Respondent finally stopped when she reached the location she originally said she was going to. A second police officer had joined the pursuit and followed the original officer to respondent's final destination. One of the officers ordered respondent out of her truck, but she did not respond. Both officers approached the truck and noticed that the doors were locked. Respondent ignored repeated orders to unlock the doors, including repeated warnings that the officers would break the windows if she did not unlock the doors.[2] Ultimately, one of the officers used his baton to break two of the truck's windows, unlocked the door, and forcibly removed and handcuffed respondent.

Respondent made the following statement after she was arrested:

> I drove away, [*sic*] because I thought you were going to hurt me. People have been trying to get me. I have things flying over my house trying to get me. I am afraid of life. That was my rock cocaine in my purse. Somebody put something in my brain and I was using cocaine to take it out of my brain. I have four kids and I am not mental. I really did see those things. Please just take me to my parents' house. The last time I used the rock cocaine was this morning.

Respondent also stated that she had been to mental health before. And when informed she was going to jail, she said she needed mental help and wanted to see a counselor instead of going to jail.

9. On September 3, 2002, in the Superior Court of the State of California, in and for the County of Sacramento, Case No. 02F05956, respondent pled nolo contendere to, and

[2] At one point in between warnings, an officer deployed his pepper spray through a partially-opened window. There was no evidence of whether respondent was actually hit by the spray.

was convicted of, a felony violation of Health and Safety Code section 11350, subdivision (a), unlawful possession of cocaine. The matter was referred to the Sacramento County Probation Department for preparation of a presentence probation report. On October 1, 2002, after considering the presentence probation report, the court ordered that imposition of judgment and sentence be suspended and respondent placed on formal probation for five years. She was also ordered to spend 90 days in the Sacramento County Jail, but the order was stayed pending her completion of a Proposition 36 drug treatment program. She was required to register as a convicted drug offender pursuant to Health and Safety Code section 11590 and pay fines, penalties, and assessments in the total sum of $691.

On November 13, 2002, respondent's probation was revoked for failing to enroll in a Proposition 36 drug treatment program, and a bench warrant was issued. The bench warrant was recalled and vacated on November 27, 2007. The court vacated its previous referral of respondent to a Proposition 36 drug treatment program, lifted the stay on the previous jail sentence, and reinstated probation on the condition that respondent spend 120 days in the Sacramento County Jail. All jail time was stayed pending her successful completion of a residential drug treatment program at Fair Oaks Recovery Center.[3]

On December 12, 2002, respondent's probation was again revoked and a bench warrant was issued because she did not complete the drug treatment program at Fair Oaks Recovery Center. The bench warrant was recalled and vacated on March 4, 2003. The court lifted the previous stay on the 180-day jail sentence and reinstated probation.

10. The factual basis for respondent's conviction arose out of the Sacramento County Sheriff's Department's response to respondent's sister-in-law's complaint that respondent was trying to commit suicide by smoking crack cocaine on July 15, 2002. When deputies arrived, they found respondent sitting on the deck of her truck. As the deputies approached, they saw respondent trying to remove something from her shirt, which was later identified as rock cocaine. As respondent stood up, a glass smoking pipe was found on the deck next to where she was sitting. A small cosmetic bag containing rock cocaine was found next to the pipe. And when deputies searched the inside of the truck, they found more rock cocaine.

Respondent was arrested and made the following statement: "People, because they control me, make me do the cocaine." Additionally, deputies noted that while making that statement, respondent "was exhibiting paranoid demeanor, making various statements as to put her mental condition in question."

11. On September 10, 2002, in the Superior Court of the State of California, in and for the County of San Joaquin, Case No. SM225264A, respondent pled guilty to, and was convicted of, a misdemeanor violation of Health and Safety Code section 11550, subdivision (a), being under the influence of cocaine. Imposition of sentence was suspended, and

[3] The court order provided that if respondent successfully completed the drug treatment program, her total jail time was 90 days. Otherwise, it was 180 days.

respondent was placed on formal probation for five years. She was referred to a Proposition 36 drug treatment program and ordered to pay fines, penalties, and assessments in the total sum of $261.

On April 1, 2003, respondent was allowed to withdraw her previous guilty plea; her conviction was vacated; the criminal complaint was amended to allege a misdemeanor violation of Health and Safety Code section 11377, subdivision (a), unlawful possession of cocaine, in lieu of a misdemeanor violation of Health and Safety Code section 11550, subdivision (a), being under the influence of cocaine; and respondent pled nolo contendere to, and was convicted of, the amended charge.

12. The factual basis for respondent's conviction arose out of a citizen's complaint to the Stockton Police Department about a suspicious truck parked on his street on June 18, 2002. When responding officers arrived, they found respondent asleep in the back of the truck. They tapped on the window and woke her. As she exited the truck, she explained that she was driving home to Galt, California when she became tired and decided to pull over to rest. As she was talking, the officers smelled an odor of an alcoholic beverage on her breath and person. They also noticed that her eyes were red and watery, and she was constantly moving around. The officers formed the opinion that respondent was under the influence of a controlled substance and arrested her.

During a search of respondent's person, one of the officers found an envelope containing $6,945.76 in cash. When asked about that money, respondent said it belonged to the construction business she and her husband owned, and she could not find him. During a search of respondent's truck, the officers found rock cocaine residue in a plastic baggie and glass pipes commonly used for smoking rock cocaine. When one of them told respondent why she was being arrested, she said: "I only use when my life is stressful."

13. On October 23, 1986, in the Superior Court of the State of California, in and for the County of Sacramento, respondent pled guilty to, and was convicted of, a misdemeanor violation of Penal Code section 488, petty theft. She was ordered to pay a fine in the amount of $102.[4]

14. The factual basis for respondent's conviction arose out of her arrest by the Sacramento County Sheriff's Department for shoplifting at JC Penney on August 13, 1986. That day, plain clothes security officers working for JC Penney observed respondent conceal several items of merchandise on her person and in her belongings and exit the store without paying for any of it.

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[4] Complainant did not introduce the court records for this conviction, and the details of the conviction were culled from the Proposed Decision that is part of Exhibit 5.

Factors in Aggravation, Mitigation, and Rehabilitation

15. Respondent testified at hearing and explained that she met her husband when she was four or five years old. They started dating when she was 14 or 15 years old, were married when she was 20 years old, and had the first of their four children the following year. On August 25, 1999, respondent suffered an unimaginable tragedy when her husband committed suicide, just seven days before her 27th birthday. At the time, they had reservations to celebrate respondent's birthday in Half Moon Bay, California.

16. Respondent provided few details about her previous criminal conduct. She had no recollection of shoplifting from JC Penney (and in fact did not even recall what she had taken or from whom), and explained that her three convictions in 2002 were each attempts to commit suicide because she could not handle the pain and grief caused by her husband's suicide. Respondent said she was returning home from a birthday celebration with friends in Santa Cruz when she was arrested for drunk driving in 2006. It was the first time she had driven to Santa Cruz since her husband's death, she was remembering the plans that they had to celebrate her birthday when he died, and she was having difficulty coping with those memories.

17. Respondent testified at length about the pain she felt and the grief she endured as a result of her husband's unexpected death. While she did not testify about having received professional help dealing with those issues, the Department's decision denying her previous application made reference to treatment she received at a Sutter-Kaiser facility because of her multiple attempts at suicide. Additionally, she told the Galt police officer who arrested her on November 9, 2002, that she had previously received mental health treatment and wanted to see a counselor instead of going to jail.

18. Respondent did, however, testify to having discovered that she was not properly grieving for her husband and how to properly do so by attending various HeartChange workshops, a series of workshops about self-improvement offered by a Christian ministry based out of Oregon. She continues to be active with the HeartChange workshops by cooking food for attendees and hosting workshops in her home.

19. Respondent explained she now recognizes that suicide is a sin, and no longer has any desire to end her life. She testified to "want[ing] to feel life again." She remains active in her four daughters' lives, and she has two grandchildren with whom she tries to spend as much time as possible. Respondent has been a member of Real Life Church in Galt, California since 2010. She attends church service every Sunday and bible studies three times during the week. She is also active in the church's outreach ministries, such as visiting members who are in the hospital, making food for members who are sick or injured, feeding the homeless, etc.

20. Respondent explained that she paid all court-ordered fines, penalties, and fees and is no longer on probation. Her last period of probation ended in January 2012. While she completed the drunk driving program required by her last conviction, she did not

complete any of the court-ordered drug treatment programs because she was "not an addict" and did not belong in treatment.

21. Respondent also explained that her previous bankruptcy filing was for her construction business only. The evidence was unclear whether any of the business' debts were actually discharged – she testified that the debtors took back their security interests in real property owned by the business, and the properties were worth more than the amount of the debt secured by them.

22. The Department has adopted criteria for evaluating an applicant's rehabilitation since committing the crimes underlying the convictions for which the Department seeks to deny her application for a real estate license. California Code of Regulations, title 10, section 2911, provides:

> The following criteria have been developed by the department pursuant to Section 482(a) of the Business and Professions Code for the purpose of evaluating the rehabilitation of an applicant for issuance or for reinstatement of a license in considering whether or not to deny the issuance or reinstatement on account of a crime or act committed by the applicant:
>
> (a) The passage of not less than two years since the most recent criminal conviction or act of the applicant that is a basis to deny the departmental action sought. (A longer period will be required if there is a history of acts or conduct substantially related to the qualifications, functions or duties of a licensee of the department.)
>
> (b) Restitution to any person who has suffered monetary losses through "substantially related" acts or omissions of the applicant.
>
> (c) Expungement of criminal convictions resulting from immoral or antisocial acts.
>
> (d) Expungement or discontinuance of a requirement of registration pursuant to the provisions of Section 290 of the Penal Code.
>
> (e) Successful completion or early discharge from probation or parole.
>
> (f) Abstinence from the use of controlled substances or alcohol for not less than two years if the conduct which is the basis to deny the departmental action sought is attributable in part to the

use of controlled substances or alcohol.

(g) Payment of the fine or other monetary penalty imposed in connection with a criminal conviction or quasi-criminal judgment.

(h) Stability of family life and fulfillment of parental and familial responsibilities subsequent to the conviction or conduct that is the basis for denial of the agency action sought.

(i) Completion of, or sustained enrollment in, formal education or vocational training courses for economic self-improvement.

(j) Discharge of, or bona fide efforts toward discharging, adjudicated debts or monetary obligations to others.

(k) Correction of business practices resulting in injury to others or with the potential to cause such injury.

(l) Significant or conscientious involvement in community, church or privately-sponsored programs designed to provide social benefits or to ameliorate social problems.

(m) New and different social and business relationships from those which existed at the time of the conduct that is the basis for denial of the departmental action sought.

(n) Change in attitude from that which existed at the time of the conduct in question as evidenced by any or all of the following:

(1) Testimony of applicant.

(2) Evidence from family members, friends or other persons familiar with applicant's previous conduct and with his subsequent attitudes and behavioral patterns.

(3) Evidence from probation or parole officers or law enforcement officials competent to testify as to applicant's social adjustments.

(4) Evidence from psychiatrists or other persons competent to testify with regard to neuropsychiatric or emotional disturbances.

(5) Absence of subsequent felony or misdemeanor convictions that are reflective of an inability to conform to societal rules when considered in light of the conduct in question.

(o) Each of the above criteria notwithstanding, no mortgage loan originator license endorsement shall be issued to an applicant for such license endorsement where the applicant has been convicted of any felony within seven (7) years from the date of his or her application for a license endorsement. This ban is not subject to mitigation or rehabilitation.

(p) Each of the above criteria notwithstanding, no mortgage loan originator license endorsement shall be issued to an applicant for such license endorsement where the applicant has ever been convicted of a felony where such felony involved an act of fraud, dishonesty, a breach of trust, or money laundering. This ban is not subject to mitigation or rehabilitation.

23. Respondent has begun the process of rehabilitation, for which she is to be commended. She has not engaged in any criminal conduct since her drunk driving arrest on September 2, 2006, is no longer on criminal probation, paid all court-imposed fines and penalties, plays an active role in her daughters and grandchildren's lives, and is active in her church and the HeartChange ministries. And while respondent still consumes alcohol, she does so only occasionally and only in moderation. There was no evidence to justify requiring her total abstinence from alcohol to establish rehabilitation. She has not used cocaine since 2003. Her previous bankruptcy filing was for her construction business only, and the evidence was unclear whether any debts were actually discharged – she explained the creditors exercised their security interests in the business' assets, which were worth more than what was owed.

Nevertheless, respondent's convictions in 2002 cause the Department concern because the underlying conduct suggests she had a drug problem,[5] for which she admitted she received no treatment. The 2007 drunk driving conviction adds to that concern. And while respondent was adamant that she was not a drug addict and her improper means of coping with her husband's unexpected death led to her drug use and overindulgence in alcohol, she did not present sufficient evidence that she has since learned proper coping

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[5] As discussed in Legal Conclusion 3, no cause exists to deny respondent's application based on the September 10, 2002 drug conviction. However, since she pled guilty to the underlying crime and such a plea constitutes an admission, her commission of the underlying crime was considered as an aggravating factor. For the ease of reference, her commission of that crime is considered as part of the other 2002 convictions, for which cause does exist.

techniques such that the Department can be assured she is unlikely to revert back to using drugs or overindulging in alcohol in the future. Respondent did not demonstrate a sufficient "change in attitude from that which existed at the time of the conduct in question ..." to establish her total rehabilitation. (Cal. Code of Regs., tit. 10, § 2911, subd. (n); see, *In re Andreani* (1939) 14 Cal.2d 736, 749.)[6] Additionally, she was on criminal probation for her various crimes for a 10-year period, which ended only in January 2012. Therefore, there has been an insufficient amount of time to fully and accurately assess her rehabilitation, and her application should be denied at this time. (See, *In re Gossage* (2000) 23 Cal.4th 1080.)

24. As discussed below, cause exists for denying respondent's application for a real estate salesperson license. When considering all the evidence discussed above, she did not produce sufficient evidence of her rehabilitation to justify issuing her either an unrestricted or restricted license at this time. Therefore, respondent's application should be denied outright.

LEGAL CONCLUSIONS

Applicable Burden/Standard of Proof

1. A person applying for a license has the burden of proving she is qualified for such license, and her showing must be by a preponderance of the evidence. (See, *Southern California Jockey Club, Inc. v. California Horse Racing Board* (1950) 36 Cal.2d 167, 177; *Breakzone Billiards v. City of Torrance* (2000) 81 Cal.App.4th 1205, 1224-1225; see also, Evid. Code, § 115.)

Cause for Denial

2. An application for a real estate license may be denied if the applicant has been convicted of a crime that is substantially related to the qualifications, functions, or duties of a real estate licensee. (Bus. & Prof. Code, §§ 480, subd. (a)(1); 10177, subd. (b).) Respondent was convicted of petty theft (Factual Finding 13), drunk driving (Factual Finding 5), evading a peace officer (Factual Finding 7), and unlawful possession of cocaine (Factual Finding 9). Petty theft is substantially related in that it constitutes the fraudulent taking of someone else's property, the employment of deceit to achieve an end, and doing of an illegal act with the intent of conferring a financial or economic benefit on the perpetrator. (Cal. Code of Regs., tit. 10, § 2910, subds. (a)(1), (4), and (8).) Evading a peace officer is substantially related

[6] It is not the Department's intent to diminish the tragedy of respondent's husband's suicide, and the pain and grief she endured is understandable – she had known him since she was four or five years old and expected them to spend the rest of their lives together. But public protection is of the upmost concern to the Department, and respondent did not adequately demonstrate that her prior use of drugs and overindulgence in alcohol was solely the product of that tragic event, or has been professionally treated, and is unlikely to occur again.

because it constitutes the doing of an illegal act that poses a threat of substantial injury to someone else or her property. (Cal. Code of Regs., tit. 10, § 2910, subd. (a)(8).) And the drunk driving and unlawful possession convictions are substantially related because they collectively constitute two drug or alcohol related convictions and one involved driving. (Cal. Code of Regs., tit. 10, § 2910, subd. (a)(11).) All four convictions collectively are substantially related because they "[d]emonstrate[] a pattern of repeated and willful disregard of law." (Cal. Code of Regs., § 2910, subd. (a)(10).) Therefore, the petty theft and evading a peace officer convictions constitute separate cause, and the drunk driving and unlawful possession convictions together constitute cause, to deny respondent's application for a real estate salesperson license pursuant to Business and Professions Code sections 480, subdivision (a)(1), and 10177, subdivision (b), individually and collectively.

3. Complainant alleged cause to deny respondent's application pursuant to Business and Professions Code sections 480, subdivision (a)(1), and 10177, subdivision (b), based on her September 10, 2002 conviction for violating Health and Safety Code section 11550, subdivision (a). But as discussed in Factual Finding 11, she was allowed to withdraw her guilty plea which was the basis of that conviction, the conviction was set aside, and she was convicted of a misdemeanor violation of Health and Safety Code section 11377, subdivision (a). Therefore, no cause exists to deny respondent application for a real estate salesperson license pursuant to Business and Professions Code sections 480, subdivision (a)(1), or 10177, subdivision (b), based on the conviction alleged. (See, *People v. Superior Court* (1982) 131 Cal.App.3d 256, 259 [when a defendant successfully withdraws her guilty plea, the case is restored to its status before entry of the plea].) And since the conviction for violating Health and Safety Code section 11377, subdivision (a), was not alleged as a basis for denying respondent's application in the statement of issues, it cannot constitute cause for denial as a matter of law. (See, e.g., *Wheeler v. State Board of Forestry* (1983) 144 Cal.App.3d 522, 527 [an order of discipline must be based on the factual and legal allegations in the operative pleading].)

4. For the reasons discussed in Factual Findings 15 through 24, respondent did not produce sufficient evidence of her rehabilitation to justify issuing her either an unrestricted or restricted real estate salesperson license at this time. Therefore, her application for a real estate salesperson license should be denied outright.

ORDER

Respondent Laura Lynn Brandon's application for a real estate salesperson license is DENIED.

DATED: April 16, 2013

COREN D. WONG
Administrative Law Judge
Office of Administrative Hearings