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FILED

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BUREAU OF REAL ESTATE

By R. dew

9 BEFORE THE
10 BUREAU OF REAL ESTATE
11 STATE OF CALIFORNIA

12 * * *

13 In the Matter of the Application of

14 LAURA LYNN BRANDON,

15 Respondent.

No. H-6340 SAC

STATEMENT OF ISSUES

16 The Complainant, TRICIA D. PARKHURST, in her official capacity as a
17 Supervising Special Investigator for the Bureau of Real Estate, State of California, brings this
18 Statement of Issues against LAURA LYNN BRANDON (the "Respondent") and is informed
19 and alleges as follows:

20 1

21 Respondent made application to the Bureau of Real Estate of the State of
22 California (the "Bureau") for a real estate salesperson license on or about November 13, 2014.

23 2

24 In response to Question 32, to wit: "Have you ever been convicted (see
25 paragraph above) of any violation of the law at the misdemeanor or felony level? If yes,
26 complete item 38 with information on each conviction", Respondent concealed and failed to
27 disclose the conviction described in Paragraph 6, below.

1 3

2 On or about January 5, 2007, in the Superior Court of the State of California,
3 County of Santa Cruz, in Case No. M35482, Respondent was convicted of violating Section
4 23152(b) of the California Vehicle Code (driving under the influence), a misdemeanor and a
5 crime which bears a substantial relationship under Section 2910, Title 10, California Code of
6 Regulations ("the Regulations"), to the qualifications, functions or duties of a real estate
7 licensee.

8 4

9 On or about November 27, 2002, in the Superior Court of the State of California,
10 County of Sacramento, in Case No. 02F09540, Respondent was convicted of violating
11 Section 2800.1(a) of the California Vehicle Code (evading police officer), a misdemeanor and
12 a crime which bears a substantial relationship under Section 2910 of the Regulations to the
13 qualifications, functions or duties of a real estate licensee.

14 5

15 On or about September 10, 2002, in the Superior Court of the State of California,
16 County of San Joaquin, in Case No. SM225264A, Respondent was convicted of violating
17 Section 11550(a) of the California Health and Safety Code (being under the influence of
18 controlled substance - cocaine), a misdemeanor and a crime which bears a substantial
19 relationship under Section 2910 of the Regulations to the qualifications, functions or duties of a
20 real estate licensee.

21 6

22 On or about September 10, 2002, in the Superior Court of the State of California,
23 County of San Joaquin, in Case No. SM226384A, Respondent was convicted of violating
24 Section 148 of the California Penal Code (obstructing peace officer), a misdemeanor and a
25 crime which bears a substantial relationship under Section 2910 of the Regulations to the
26 qualifications, functions or duties of a real estate licensee.

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On or about September 3, 2002, in the Superior Court of the State of California, County of Sacramento, in Case No. 02F05956, Respondent was convicted of violating Section 11350(a) of the California Health and Safety Code (possession of controlled substance - cocaine base), a felony and a crime which bears a substantial relationship under Section 2910 of the Regulations to the qualifications, functions or duties of a real estate licensee.

On or about October 23, 1986, in the Superior Court of the State of California, County of Sacramento, in Case No. 86M14534, Respondent was convicted of violating Section 488 of the California Penal Code (petty theft), a misdemeanor and a crime which bears a substantial relationship under Section 2910 of the Regulations to the qualifications, functions or duties of a real estate licensee.

PREVIOUS ADMINISTRATIVE PROCEEDINGS

Effective July 18, 2013, in Case No. H-5958 SAC, before the Bureau, the Real Estate Commissioner (Commissioner) denied Respondent's application for a plenary real estate salesperson license pursuant to Sections 480(a) and 10177(b) of the California Business and Professions Code ("the Code").

Effective April 25, 2011, in Case No. H-5495 SAC, before the Bureau, the Commissioner denied Respondent's application for a plenary real estate salesperson license pursuant to Sections 480(a), 480(c), 10177(a) and 10177(b) of the Code.

Effective January 10, 1989, in Case No. H-2378 SAC, before the Bureau, the Commissioner denied Respondent's application for a plenary real estate salesperson license pursuant to Sections 480(a), 480(c), 10177(a) and 10177(b) of the Code, but granted

1 Respondent a restricted real estate salesperson license subject to the terms, conditions, and
2 restrictions set forth in Sections 10153.4 and 10156.7 of the Code.

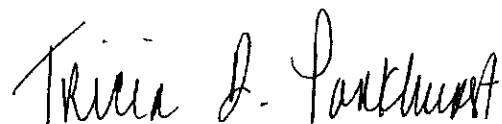
3 12

4 Respondent's failure to reveal in her application the conviction set forth in
5 Paragraph 6, above, constitutes the procurement of or attempt to procure a real estate license by
6 fraud, misrepresentation or deceit, or by making a material misstatement of fact in said
7 application, which failure is cause for denial of Respondent's application for a real estate
8 salesperson license pursuant to the provisions of Sections 480(d) and 10177(a) of the Code.

9 13

10 The facts alleged in Paragraphs 3 through 8 above constitute cause for denial of
11 Respondent's application for a real estate license under Sections 480(a) and 10177(b) of the
12 Code.

13 WHEREFORE, Complainant prays that the above-entitled matter be set for
14 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
15 authorize the issuance of, and deny the issuance of a real estate salesperson license to
16 Respondent, and for such other and further relief as may be proper under any other provision of
17 the law.

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21 TRICIA D. PARKHURST
22 Supervising Special Investigator

23 Dated at Sacramento, California,
24 this 2nd day of December 2015.
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