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1 JOHN W. BARRON, Counsel (SBN 171246)
2 Bureau of Real Estate
3 P. O. Box 137007
4 Sacramento, CA 95813-7007

FILED

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4 Telephone: (916) 263-8670 (main)
5 (916) 263-8680 (direct)

BUREAU OF REAL ESTATE
By B. Nicholas

8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 ***

11 In the Matter of the Application of)
12 SEAN ANDRE BEATTIE,) No. H- 6366 SAC
13 Respondent.) STATEMENT OF ISSUES
14)

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

19 1

20 Respondent made application to the Bureau of Real Estate of the State of
21 California for a real estate broker license on or about September 15, 2014.

22 2

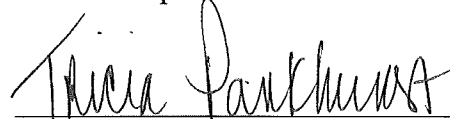
23 On or about June 3, 2003, in the United States District Court, Northern District of
24 California, Case No. CR00-0360-01 VRW, Respondent was convicted of violating 21 U.S.C.
25 Section 846 (conspiracy to distribute cocaine and to possess cocaine with intent to distribute), a
26 Class A felony, and 21 U.S.C. 841(a) and 841(b)(1)(A) and (B) (possession with intent to
27 distribute cocaine), a Class B felony, crimes that bear a substantial relationship under Section

1 2910, Title 10, of the California Code of Regulations to the qualifications, functions or duties of
2 a real estate licensee.

3 3

4 Respondent's criminal convictions, described in Paragraph 2, above, constitute
5 cause for denial of Respondent's application for a real estate broker license pursuant to the
6 provisions of Section 480(a) (criminal conviction) and 10177(b) (criminal conviction) of the
7 California Business and Professions 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 broker license to Respondent,
11 and for such other and further relief as may be proper under the provisions of the law.

12 

13 TRICIA PARKHURST
14 Supervising Special Investigator

15 Dated at Sacramento, California,
16 this 29th day of February, 2016.