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1	Bureau of Real Estate P.O. BOX 137007 Sacramento, CA 95813-7007				
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3			BUREAU OF REAL ESTATE		
J				By H. MGZ	
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8	BEFORE THE BUREAU OF REAL ESTATE STATE OF CALIFORNIA				
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	* * *				
11	In the Matter of	of the Application of)		
12) N	IO. H-6612 SAC	
13	JONATH	HAN FRANCIS PATRICK,))	
		Respondent.) <u>s</u>	TATEMENT OF ISSUES	
14		respondent.	}		
15	The Complainant, TRICIA D. PARKHURST, acting in her official capacity as				
16	Supervising Special Investigator of the State of California is a state				
17	Supervising Special Investigator of the State of California, for this Statement of Issues against				
	JONATHAN FRANCIS PATRICK ("Respondent"), is informed and alleges as follows:				
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19	On or about October 12, 2016, Respondent made application to the Bureau of				
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	Real Estate of the State of California for a real estate salesperson license.				
21	CRIMINAL CONVICTIONS				
22	2				
23	On or about July 6, 2006, in the Superior Court of the State of California, County				
24					
	of Placer, Case No 62-141463, Respondent was convicted of violating Sections 23152(a)				
25	(driving under the influence) and 23152 (b) (driving under the influence) of the California				

Vehicle Code, misdemeanors and crimes that bear a substantial relationship to the qualifications,

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functions or duties of a real estate licensee pursuant to Section 2910, Title 10, of the California Code of Regulations ("Regulations").

On or about July 6, 2006, in the Superior Court of the State of California, County of Placer, Case No 62-143854, Respondent was convicted of violating Section 23152(a) of the California Vehicle Code, a misdemeanor and a crime that bears a substantial relationship to the qualifications, functions or duties of a real estate licensee pursuant to Section 2910 of the Regulations.

On or about July 6, 2006, in the Superior Court of the State of California, County of Placer, Case No 62-144916, Respondent was convicted of violating Sections 23152(a) and 23152 (b) of the California Vehicle Code, misdemeanors and crimes that bear a substantial relationship to the qualifications, functions or duties of a real estate licensee pursuant to Section 2910 of the Regulations.

On or about April 12, 2005, in the Superior Court of the State of California, County of Sacramento, Case No. 04T05521, Respondent was convicted of violating Sections 2002(a) (hit and run) and 23152(a) of the California Vehicle Code, misdemeanors and crimes that bear a substantial relationship to the qualifications, functions or duties of a real estate licensee pursuant to Section 2910 of the Regulations.

GROUNDS FOR DENIAL

Respondent's criminal convictions described above in Paragraphs 2, 3, and 4, constitute cause for denial of Respondent's application for a real estate salesperson license pursuant to the provisions of Sections 480(a)(1) (conviction of crime) and 10177(b) (conviction of crime) of the Business and Professions Code ("Code").

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Respondent's criminal conviction described above in Paragraph 5, constitutes cause for denial of Respondent's application for a real estate salesperson license pursuant to the provisions of Sections 480(a)(1), 480(a)(2) (act involving dishonesty, fraud, or deceit), 10177(b), and 10177(j) (engaged in conduct that constitutes fraud or dishonest dealing) of the Code.

WHEREFORE, the Complainant prays that the above-entitled matter be set for hearing and, upon proof of the charges contained herein, that the Commissioner refuse to authorize the issuance of, and deny the issuance of, a real estate salesperson/broker license to Respondent, and for such other and further relief as may be proper under applicable provisions of law.

TRICIA D. PARKHURST Supervising Special Investigator

Dated at Sacramento, California,

DISCOVERY DEMAND

Pursuant to Sections 11507.6, et seq. of the Administrative Procedure Act, the Bureau hereby makes demand for discovery pursuant to the guidelines set forth in the Administrative Procedure Act. Failure to provide Discovery to the Bureau may result in the exclusion of witnesses and documents at the hearing or other sanctions that the Office of Administrative Hearings deems appropriate.