

FILED

DEC 05 2017

BUREAU OF REAL ESTATE

By H. Negz

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8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Application of)
12 JONATHAN FRANCIS PATRICK,) NO. H-6612 SAC
13)
14 Respondent.) STATEMENT OF ISSUES
15)

16 The Complainant, TRICIA D. PARKHURST, acting in her official capacity as a
17 Supervising Special Investigator of the State of California, for this Statement of Issues against
18 JONATHAN FRANCIS PATRICK ("Respondent"), is informed and alleges as follows:

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20 On or about October 12, 2016, Respondent made application to the Bureau of
21 Real Estate of the State of California for a real estate salesperson license.

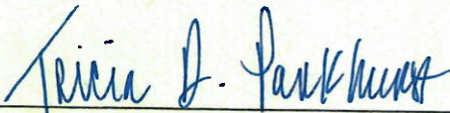
22 CRIMINAL CONVICTIONS

23 2

24 On or about July 6, 2006, in the Superior Court of the State of California, County
25 of Placer, Case No 62-141463, Respondent was convicted of violating Sections 23152(a)
26 (driving under the influence) and 23152 (b) (driving under the influence) of the California
27 Vehicle Code, misdemeanors and crimes that bear a substantial relationship to the qualifications,
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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,
this 1st day of December 2017.

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.