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FILED

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BUREAU OF REAL ESTATE

By B. Nicholas

8
9 **BEFORE THE BUREAU OF REAL ESTATE**

10 **STATE OF CALIFORNIA**

11 ***

12 In the Matter of the Application of)
13) H-6640 SAC
14 SHANNA NICOLE RICHES,)
15) STATEMENT OF ISSUES
16 Respondent.)
17)

18 The Complainant, TRICIA PARKHURST, in her official capacity as a
19 Supervising Special Investigator for the Bureau of Real Estate, State of California, brings this
20 Statement of Issues against SHANNA NICOLE RICHES ("Respondent"), and is informed and
21 alleges as follows:

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23 Respondent made application to the Bureau of Real Estate of the State of
24 California for a real estate salesperson license on or about October 7, 2016.

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26 In response to Question 23 of the Background Information Section of said
27 application, to wit: "HAVE YOU EVER BEEN CONVICTED (SEE PARAGRAPH ABOVE)
OF ANY VIOLATION OF THE LAW AT THE MISDEMEANOR OR FELONY LEVEL? IF

1 **YES, COMPLETE ITEM 29 WITH INFORMATION ON EACH CONVICTION”,**

2 Respondent concealed and failed to disclose the convictions described in Paragraph 5, below.

3 3

4 On or about April 26, 2012, in the Justice Court of Iron, County of Iron, State of
5 Utah, Case No. 111000504, Respondent was convicted of violating Section 1-76-6-404 of the
6 Utah Codes (theft), a misdemeanor and a crime that bears a substantial relationship under Section
7 2910, Title 10, of the California Code of Regulations (“the Regulations”) to the qualifications,
8 functions or duties of a real estate licensee.

9 4

10 On or about November 16, 2010, in the Justice Court of Iron, County of Iron,
11 State of Utah, Case No. 101001085, Respondent was convicted of violating Section 1-76-6-206
12 of the Utah Codes (trespassing), a misdemeanor and a crime that bears a substantial
13 relationship under Section 2910 of the Regulations to the qualifications, functions or duties of a
14 real estate licensee.

15 5

16 On or about September 26, 2008, in the Justice Court of Sunset, County of
17 Davis, State of Utah, Case No. 085001340, Respondent was convicted of violating Sections 1-
18 53-3-227.S (operating on a suspended license) and 2-41-12A-603 (operating vehicle without a
19 license) of the Utah Codes, a misdemeanors and crimes that bear a substantial relationship
20 under Section 2910 of the Regulations to the qualifications, functions or duties of a real estate
21 licensee.

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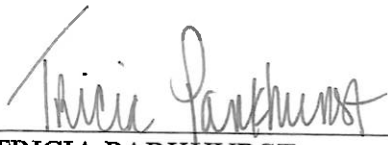
23 Respondent’s failure to reveal in her application the convictions set forth in
24 Paragraph 5, above, constitutes the procurement of or attempt to procure a real estate license by
25 fraud, misrepresentation or deceit, or by making a material misstatement of fact in said
26 application, which failure is cause for denial of Respondent’s application for a real estate
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1 salesperson license pursuant to the provisions of Sections 480(d), 10177(a) and 10177(j) (fraud
2 or dishonest dealing) of the California Business and Professions Code ("the Code").

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4 6

5 Respondent's criminal convictions, described in Paragraphs 3 through 5, above,
6 constitute cause for denial of Respondent's application for a real estate salesperson license
7 pursuant to the provisions of Section 480(a), 10177(b) and 10177(j) of the 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 salesperson license to
11 Respondent, and for such other and further relief as may be proper under the provisions of the
12 law.

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14 TRICIA PARKHURST
15 Supervising Special Investigator

16 Dated at Sacramento, California,
17 this 19th day of January, 2018.
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