

1 KYLE T. JONES, Counsel (SBN 300751)
2 Bureau of Real Estate
3 P.O. BOX 137007
Sacramento, CA 95813-7007

4 Telephone: (916) 263-8672
5 (916) 263-3767 (Fax)
6 (916) 263-7303 (Direct)

FILED

APR 23 2018

BUREAU OF REAL ESTATE

By H. Deacy

8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Application of)
12) NO. H-6668 SAC
13 JOSHUA JAMES NEADEAU,)
14) STATEMENT OF ISSUES
Respondent.)

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

18 1

19 On or about September 25, 2017, Respondent made application to the Bureau of
20 Real Estate of the State of California for a real estate salesperson license.

21 FAILURE TO DISCLOSE CONVICTION

22 2

23 In response to Question 28 of said application to wit: "HAVE YOU EVER BEEN
24 CONVICTED (SEE PARAGRAPH ABOVE) OF ANY VIOLATION OF THE LAW AT THE
25 MISDEMEANOR OR FELONY LEVEL? IF YES, COMPLETE ITEM 28 WITH
26 INFORMATION ON EACH CONVICTION," Respondent concealed and failed to disclose
27 the conviction described below in Paragraph 3.

1 CRIMINAL CONVICTION

2 3

3 On or about March 22, 2005, in the Superior Court of the State of California,
4 County of San Joaquin, Case No. SM242417A, Respondent was convicted of violating Section
5 484(a) (petty theft) of the California Penal Code, a misdemeanor and a crime that bears a
6 substantial relationship to the qualifications, functions or duties of a real estate licensee pursuant
7 to Section 2910, Title 10, of the California Code of Regulations.

8 GROUND FOR DENIAL

9 4

10 Respondent's failure to disclose the conviction described above in Paragraph 3
11 constitutes cause for denial of Respondent's application for a real estate salesperson license
12 pursuant to the provisions of Sections 480(d) (false statement of fact required to be revealed in
13 application) and 10177(a) (attempted procurement of real estate license by fraud,
14 misrepresentation, or deceit) of the Business and Professions Code ("Code").

15 5

16 Respondent's criminal conviction described above in Paragraph 3, constitutes
17 cause for denial of Respondent's application for a real estate salesperson license pursuant to the
18 provisions of Code sections 480(a)(1) (conviction of crime), 480(a)(2) (act involving dishonesty,
19 fraud, or deceit), 10177(b) (conviction of crime), and 10177(j) (engaged in conduct that
20 constitutes fraud or dishonest dealing) of the Code.

21 WHEREFORE, the Complainant prays that the above-entitled matter be set for
22 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
23 authorize the issuance of, and deny the issuance of, a real estate salesperson/broker license to

24 ///

25 ///

26 ///

27 ///

1 Respondent, and for such other and further relief as may be proper under applicable provisions of
2 law.

3 

4 TRICIA D. PARKHURST
5 Supervising Special Investigator

6 Dated at Oakland, California,
7 this 18th day of April, 2018.
8

9
10 DISCOVERY DEMAND

11 Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the
12 Department hereby makes demand for discovery pursuant to the guidelines set forth in the
13 *Administrative Procedure Act*. Failure to provide Discovery to the Department may result in the
14 exclusion of witnesses and documents at the hearing or other sanctions that the Office of
15 Administrative Hearings deems appropriate.
16
17
18
19
20
21
22
23
24
25
26
27