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2	Department of Real Estate
3	P.O. BOX 137007 Sacramento, CA 95813-7007 FILED
4	Telephone: (916) 576-8700 NOV 0 6 2019
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6	(916) 576-7840 (Direct) By B.M.Cudlas
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8	BEFORE THE DEPARTMENT OF REAL ESTATE
9	STATE OF CALIFORNIA
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11	In the Matter of the Application of
12) NO. H-6895 SAC
13	DOMINIC MAES,)) <u>STATEMENT OF ISSUES</u>
14	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	DOMINIC MAES ("Respondent"), is informed and alleges as follows:
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19	On or about May 3, 2019, Respondent made application to the Department of
20	Real Estate of the State of California for a real estate salesperson license.
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22	On or about July 11, 2017, in the Superior Court of the State of California, County
23	of Santa Barbara, Case No. 17CR06893, Respondent was convicted of violating Section 602(m)
24	(trespass) of the California Penal Code, a misdemeanor and a crime that bears a substantial
25	relationship to the qualifications, functions or duties of a real estate licensee pursuant to Section
26	2910, Title 10, of the California Code of Regulations ("Regulations").
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2	On or about February 21, 2017, in the Superior Court of the State of California,
3	County of Santa Barbara, Case No. 17CR01075, Respondent was convicted of violating Section
4	485 (appropriate lost property) of the California Penal Code, a misdemeanor and a crime that
5	bears a substantial relationship to the qualifications, functions or duties of a real estate licensee
6	pursuant to Section 2910 of the Regulations.
7	GROUNDS FOR DENIAL
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9	Respondent's criminal convictions described above in Paragraphs 2 and 3
10	constitute cause for denial of Respondent's application for a real estate salesperson license
11	pursuant to the provisions of Sections 480(a)(1) (conviction of crime), 480(a)(2) (act involving
12	dishonesty, fraud, or deceit), 10177(b) (conviction of crime), and 10177(j) (engaged in conduct
13	that constitutes fraud or dishonest dealing) of the Code.
14	WHEREFORE, the Complainant prays that the above-entitled matter be set for
15	hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
16	authorize the issuance of, and deny the issuance of, a real estate salesperson/broker license to
17	Respondent, and for such other and further relief as may be proper under applicable provisions of
18	law.
19	Atian & Prakhused
20	TRICIA D. PARKHURST
21	Supervising Special Investigator
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23	Dated at Sacramento, California,
25	this $\underline{\gamma}$ day of $\underline{\gamma}$ day of $\underline{\gamma}$ 2019.
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1	DISCOVERY DEMAND
2	Pursuant to Sections 11507.6, et seq. of the Administrative Procedure Act, the
3	Department hereby makes demand for discovery pursuant to the guidelines set forth in the
4	Administrative Procedure Act. Failure to provide Discovery to the Department may result in the
5	exclusion of witnesses and documents at the hearing or other sanctions that the Office of
6	Administrative Hearings deems appropriate.
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