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8	BEFORE THE DEPARTMENT OF REAL ESTATE
9	STATE OF CALIFORNIA
10	* * *
11	In the Matter of the Application of
12) NO. H-6984 SAC NICHOLAS D. CREW,
13) <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	NICHOLAS D. CREW ("Respondent"), is informed and alleges as follows:
18	1
19	On or about October 15, 2019, Respondent made application to the Department of
20	Real Estate of the State of California for a real estate salesperson license.
21	2
22	On or about October 11, 2012, in the Superior Court of the State of California,
23	County of Yolo, Case No. 10004746, Respondent was convicted of violating Section
24	211/212.5(a)/213(a)(1)(A) (robbery within inhabited structure) of the California Penal Code, a
25	felony and a crime that bears a substantial relationship to the qualifications, functions or duties of
26	a real estate licensee pursuant to Section 2910, Title 10, of the California Code of Regulations.
27	· · · · · · · · · · · · · · · · · · ·

GROUNDS FOR DENIAL

Respondent's criminal conviction described above in Paragraph 2 constitutes 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), 480(a)(2) (act involving dishonesty, fraud, or deceit), 10177(b) (conviction of crime), 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 Jan day of My, 20

DISCOVERY DEMAND

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