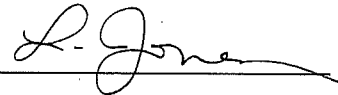


FILED

August 20, 2012

DEPARTMENT OF REAL ESTATE

By 

TRULY SUGHRUE, Counsel
State Bar No. 223266
Department of Real Estate
P.O. Box 187007
Sacramento, CA 95818-7007

Telephone: (916) 227-0789
(916) 227-0781 (Direct)

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Application of

PAMELA LAUREEN STERLING,

Respondent.

No. H-11442 SF

STATEMENT OF ISSUES

The Complainant, ROBIN S. TANNER, a Deputy Real Estate Commissioner of the State of California, for Statement of Issues against PAMELA LAUREEN STERLING (Respondent), is informed and alleges as follows:

1

Complainant, ROBIN S. TANNER, a Deputy Real Estate Commissioner of the State of California, makes this Statement of Issues in her official capacity and not otherwise.

2

Respondent made application to the Department of Real Estate of the State of California for a real estate salesperson license on or about March 29, 2012.

3

On or about June 18, 2004, in the Superior Court, County of Alameda, Respondent was convicted of Section 487(b)(3) of the California Penal Code (Grand Theft by

1 Servant), a misdemeanor, and crime which bears a substantial relationship under Section 2910,
2 Title 10, California Code of Regulations, to the qualifications, functions, or duties of a real estate
3 licensee.

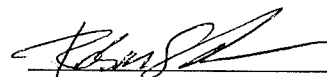
4 4

5 On or about July 29, 2004, in the Superior Court, County of Alameda, Respondent
6 was convicted of a violation of Section 470(a) of the California Penal Code (Forgery), a felony,
7 and crime which bears a substantial relationship under Section 2910, Title 10, California Code of
8 Regulations, to the qualifications, functions, or duties of a real estate licensee.

9 5

10 The crimes of which Respondent was convicted, as alleged above, constitute
11 cause for denial of Respondent's application for a real estate license under Sections 480(a) and
12 10177(b) of the California Business and Professions Code.

13 WHEREFORE, the Complainant prays that the above-entitled matter be set for
14 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
15 authorize the issuance of, and deny the issuance of, a real estate salesperson license to
16 Respondent, and for such other and further relief as may be proper under other provisions of law.

17
18 

19 ROBIN S. TANNER
20 Deputy Real Estate Commissioner

21 Dated at Oakland, California,
22 this 13th day of August, 2012.

23
24 DISCOVERY DEMAND

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