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NOV 23 2016

BUREAU OF REAL ESTATE

By B. Nicholas

7
8 BEFORE THE BUREAU OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Application of)
12)
13 MING SHAO,)

No. H-12023 SF

STATEMENT OF ISSUES

14 Respondent.)

15 The Complainant, ROBIN S. TANNER, a Supervising Special Investigator of the
16 State of California, for Statement of Issues against MING SHAO (Respondent), alleges as
17 follows:

18 1

19 Complainant makes this Statement of Issues in her official capacity.

20 2

21 On or about May 9, 2016, Respondent made application to the Bureau of Real
22 Estate of the State of California (Bureau) for a real estate salesperson license.

23 3

24 On or about February 24, 2011, in the United States District Court, Northern
25 District of California, Case No. CR 1000748 JF, Respondent was convicted of violating 18
26 USC 1030(A) (2) (computer intrusion), a felony and a crime that bears a substantial relationship
27 under Section 2910, Title 10, California Code of Regulations to the qualifications, functions,

1 USC 1030(A) (2) (computer intrusion), a felony and a crime that bears a substantial relationship
2 under Section 2910, Title 10, California Code of Regulations to the qualifications, functions,
3 or duties of a real estate licensee.

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5 PRIOR ADMINISTRATIVE PROCEEDINGS

6 Effective May 7, 2013 in Case No. H 11408 SF, before the then Bureau, the Real
7 Estate Commissioner denied Respondent's application for a real estate salesperson license
8 pursuant to Sections 480(a) (conviction of crime) and 10177(b) (further grounds for disciplinary
9 action-conviction of crime) of the Code.

10

11 Respondent's criminal conviction as described in Paragraph 3, above, constitutes
12 cause for denial of Respondent's application for a real estate salesperson license under Sections
13 480(a) and 10177(b) of the Code.

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

19
20 

21 ROBIN S. TANNER
22 Supervising Special Investigator

23 Dated at Oakland, California,
24 this 18th day of November, 2016.