

FILED

APR 06 2017

BUREAU OF REAL ESTATE

By M. Roberts

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8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Application of)
12) NO. H-12074 SF
13 JUAN GABRIEL FLORES GALINDO,)
14 Respondent.) STATEMENT OF ISSUES
15)

16 The Complainant, ROBIN S. TANNER, acting in her official capacity as a
17 Supervising Special Investigator of the State of California, for this Statement of Issues against
18 JUAN GABRIEL FLORES GALINDO ("Respondent"), is informed and alleges as follows:

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20 On or about May 10, 2016, Respondent made application to the Bureau of Real
21 Estate of the State of California for a real estate salesperson license.

22 FAILURE TO DISCLOSE LICENSE DENIAL

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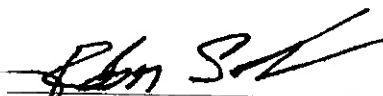
24 In response to Question 30 of said application to wit: "HAVE YOU EVER HAD
25 A DENIED, SUSPENDED, RESTRICTED OR REVOKED BUSINESS OR PROFESSIONAL
26 LICENSE (INCLUDING REAL ESTATE), IN CALIFORNIA OR ANY OTHER STATE,"
27 Respondent concealed and failed to disclose the prior denial of his application for a smog check
inspector license and smog check repair technician license as described below in Paragraph 3.

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Respondent's criminal conviction described above in Paragraph 4, constitutes cause for denial of Respondent's application for a real estate salesperson license pursuant to the provisions of Code 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).

Respondent's prior license revocations described above in Paragraphs 5, 6, and 7, constitutes cause for denial of Respondent's application for a real estate salesperson license pursuant to the provisions of Code sections 480(a)(2) (act involving dishonesty, fraud, or deceit), 10177(f) (license issued by another agency of this state revoked for acts that, if done by a real estate licensee, would be grounds for the suspension or revocation of a real estate license), and 10177(j) (engaged in conduct that constitutes fraud or dishonest dealing).

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.



ROBIN S. TANNER
Supervising Special Investigator

Dated at Oakland, California,
this 4th day of April, 2017.

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.

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