

FILED

OCT 05 2017

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BUREAU OF REAL ESTATE

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7

8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Application of)
12) NO. H-12137 SF
13 PATRICIO TOMAS PANGA ONQUIT,)
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 PATRICIO TOMAS PANGA ONQUIT ("Respondent"), is informed and alleges as follows:

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20 On or about February 13, 2017, Respondent made application to the Bureau of
21 Real Estate of the State of California for a real estate salesperson license.

22 FAILURE TO DISCLOSE CONVICTIONS

23 2

24 In response to Question 28 of said application to wit: "HAVE YOU EVER BEEN
25 CONVICTED (SEE PARAGRAPH ABOVE) OF ANY VIOLATION OF THE LAW AT THE
26 MISDEMEANOR OR FELONY LEVEL? IF YES, COMPLETE ITEM 34 WITH

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1 **INFORMATION ON EACH CONVICTION,**” Respondent concealed and failed to disclose
2 the convictions described below in Paragraphs 4, 6, 7, 9, and 10.

3 CRIMINAL CONVICTIONS

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5 On or about June 11, 2015, in the Municipal Court of the State of Arizona,
6 County of Maricopa, Case No. 14-019578-2, Respondent was convicted of violating Section 13-
7 2904(A)(1) of the Arizona Revised Statutes (disorderly conduct), a misdemeanor and a crime
8 that bears a substantial relationship to the qualifications, functions or duties of a real estate
9 licensee pursuant to Section 2910, Title 10, of the California Code of Regulations
10 (“Regulations”).

11 4

12 On or about June 9, 2015, in the Municipal Court of the State of Arizona, County
13 of Pinal, Case No. M1149TR2015001239, Respondent was convicted of violating Section 28-
14 3473(A) of the Arizona Revised Statutes (driving on a suspended/revoked/cancelled license), a
15 misdemeanor and a crime that bears a substantial relationship to the qualifications, functions or
16 duties of a real estate licensee pursuant to Section 2910 of the Regulations.

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18 On or about July 29, 2011, in the Superior Court of the State of California, County
19 of Alameda, Case No. 242575, Respondent was convicted of violating Section 23152(b) of the
20 California Vehicle Code (driving under the influence), a misdemeanor and a crime that bears a
21 substantial relationship to the qualifications, functions or duties of a real estate licensee pursuant
22 to Section 2910 of the Regulations.

23 6

24 On or about March 2, 2011, in the Municipal Court of the State of California,
25 County of Santa Clara, Case No. C1092255, Respondent was convicted of violating Section
26 14601.5(a) of the California Vehicle Code (driving while license suspended/revoked), a

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1 misdemeanor and a crime that bears a substantial relationship to the qualifications, functions or
2 duties of a real estate licensee pursuant to Section 2910 of the Regulations.

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4 On or about August 9, 2010, in the Superior Court of the State of California,
5 County of San Diego, Case No. M105463, Respondent was convicted of violating Section 415(3)
6 of the California Penal Code (offensive words in a public place), a misdemeanor and a crime that
7 bears a substantial relationship to the qualifications, functions or duties of a real estate licensee
8 pursuant to Section 2910 of the Regulations.

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10 On or about April 27, 2010, in the Superior Court of the State of California,
11 County of San Diego, Case No. S237511, Respondent was convicted of violating Section
12 23152(b) of the California Vehicle Code (driving under the influence), a misdemeanor and a
13 crime that bears a substantial relationship to the qualifications, functions or duties of a real estate
14 licensee pursuant to Section 2910 of the Regulations.

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16 On or about July 11, 2006, in the Municipal Court of the State of California,
17 County of Santa Clara, Case No. CC631015, Respondent was convicted of violating Section
18 14601.1(a) of the California Vehicle Code (driving while license suspended/revoked), a
19 misdemeanor and a crime that bears a substantial relationship to the qualifications, functions or
20 duties of a real estate licensee pursuant to Section 2910 of the Regulations.

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22 On or about November 13, 2003, in the Superior Court of the State of California,
23 County of Santa Clara, Case No. CC328035, Respondent was convicted of violating Section
24 23109(c) of the California Vehicle Code (exhibition of speed), a misdemeanor and a crime that
25 bears a substantial relationship to the qualifications, functions or duties of a real estate licensee
26 pursuant to Section 2910 of the Regulations.

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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.