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FILED

SEP 17 2018

DEPARTMENT OF REAL ESTATE

By X. Knapp

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Application of)

12 SYDNEY SIMONE LADAY,)

13 Respondent.)

DRE No. H-12273 SF

14 STATEMENT OF ISSUES

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

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19 On or about July 3, 2017, Respondent made application to the Department of Real
20 Estate of the State of California for a real estate salesperson license.

21 CRIMINAL CONVICTIONS

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23 On or about June 25, 2013, in the Superior Court of the State of California,
24 County of San Mateo, Case No. SF386203A, Respondent was convicted of violating Section
25 10980(c)(2) (willfully and knowingly, with the intent to deceive, fail to disclose a material fact to
26 obtain aid over \$950) of the Welfare and Institutions Code, a misdemeanor and a crime that bears
27 a substantial relationship to the qualifications, functions or duties of a real estate licensee

1 pursuant to Section 2910, Title 10, of the California Code of Regulations ("Regulations").

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3 On or about January 14, 2010, in the Superior Court of the State of California,
4 County of San Mateo, Case No. SM365631A, Respondent was convicted of violating Section
5 484 (theft) of the California Penal Code, a misdemeanor and a crime that bears a substantial
6 relationship to the qualifications, functions or duties of a real estate licensee pursuant to Section
7 2910 of the Regulations.

8 GROUND FOR DENIAL

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10 Respondent's criminal convictions described above in Paragraphs 2 and 3,
11 constitute cause for denial of Respondent's application for a real estate salesperson license
12 pursuant to the provisions of Sections 480(a)(1) (conviction of crime), 480(a)(2) (act involving
13 dishonesty, fraud, or deceit), 10177(b) (conviction of crime), and 10177(j) (engaged in conduct
14 that constitutes fraud or dishonest dealing) of the Business and Professions Code.

15 WHEREFORE, the 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 salesperson/broker license to
18 Respondent, and for such other and further relief as may be proper under applicable provisions of
19 law.

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22 ROBIN S. TANNER
23 Supervising Special Investigator

24 Dated at Oakland, California,

25 this 7th day of September, 2018.
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