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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-12522 SF JERRY YUN FEI WANG,
13) <u>STATEMENT OF ISSUES</u> Respondent.
14)
15	The Complainant, STEPHANIE YEE, acting in her official capacity as a
16	Supervising Special Investigator of the State of California, for this Statement of Issues against
17	JERRY YUN FEI WANG ("Respondent"), is informed and alleges as follows:
18	1
19	On or about May 28, 2020, Respondent made application to the Bureau of Real
20	Estate of the State of California for a real estate salesperson license.
21	2
22	On or about September 14, 2015, in the United States District Court, Northern
23	District of California, Case No. CR-12-00581-001EJD, Respondent was convicted of violating
24	Section 1001(a)(3) (use of false document), Title 18, of the United States Code, a felony and a
25	crime that bears a substantial relationship to the qualifications, functions or duties of a real estate
26	licensee pursuant to Section 2910, Title 10, of the California Code of Regulations.
27	

GROUNDS FOR DENIAL

Respondent's criminal conviction described above in Paragraph 2 constitutes cause for denial of Respondent's application for a real estate salesperson license pursuant to the provisions of Sections 480(a)(1) (conviction of crime), 10177(b) (conviction of crime), and 10177(j) (engaged in conduct that constitutes fraud or dishonest dealing) of the Business and Professions Code.

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.

STEPHANIE YEE

Supervising Special Investigator

Dated at Oakland, California, this 210th day of Fundam, 2021.

DISCOVERY DEMAND

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