

1 that bears a substantial relationship under Section 2910, Title 10, of the California Code of
2 Regulations (“Regulations”) to the qualifications, functions or duties of a real estate licensee.

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4 On or about April 4, 2014, in the Superior Court of California, County of San
5 Joaquin, Case No. CR-2013-4061845, Respondent was convicted of violating California Penal
6 Code Section 496D(A) (possession of stolen property), a felony and crime that bears a
7 substantial relationship under Section 2910 of the Regulations to the qualifications, functions or
8 duties of a real estate licensee.

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10 On or about April 04, 2014, in the Superior Court of California, County of San
11 Joaquin, Case No. CR-2013-4061845, Respondent was convicted of violating California Vehicle
12 Code Section 10851(A) (theft of a vehicle), a felony and crime that bears a substantial
13 relationship under Section 2910 of the Regulations to the qualifications, functions or duties of a
14 real estate licensee.

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16 On or about May 15, 2009, in the Superior Court of California, County of Fresno,
17 Case No. F08902987, Respondent was convicted of violating California Penal Code Section
18 460(B) (second degree commercial burglary), a felony and crime that bears a substantial
19 relationship under Section 2910 of the Regulations to the qualifications, functions or duties of a
20 real estate licensee.

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22 On or about May 15, 2009, in the Superior Court of California, County of Fresno,
23 Case No. F08902987, Respondent was convicted of violating California Penal Code Section
24 470(D) (check forgery), a felony and crime that bears a substantial relationship under Section
25 2910 of the Regulations to the qualifications, functions or duties of a real estate licensee.

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On or about March 29, 1995, in the Superior Court of California, County of Alameda, Case No. H-20340-B, Respondent was convicted of violating California Penal Code Section 211(robbery), a felony and crime that bears a substantial relationship under Section 2910 of the Regulations to the qualifications, functions or duties of a real estate licensee.

GROUND FOR DENIAL

The facts alleged above in Paragraphs 2 through 7 constitute grounds for the denial of Respondent’s application for a real estate salesperson license under Sections 480(a) (conviction of a crime) and 10177(b) (conviction of crime substantially related to the qualifications, functions, or duties of a real estate licensee) of the Code.

The facts alleged above in Paragraph 6 constitute additional grounds for the denial of Respondent’s application for a real estate salesperson license under Section 10177(j) (fraud or dishonest dealings) of the Code.

WHEREFORE, 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 license to Respondent, and for such other and further relief as may be proper under other provisions of law.


STEPHANIE YEE
Supervising Special Investigator

Dated at Oakland, California
this 13th day of March, 2023.

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DISCOVERY DEMAND

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