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**FILED**

OCT 07 2015

BUREAU OF REAL ESTATE

By *Loyd Danner*

8 BEFORE THE BUREAU OF REAL ESTATE  
9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Application of ) No. H- 39984 LA  
12 )  
13 MARINE TER-HAROUTUNIAN, ) STATEMENT OF ISSUES  
14 )  
15 Respondent. )  
16 )

16 The Complainant, Maria Suarez, a Supervising Special Investigator of the State  
17 of California, acting in her official capacity, for Statement of Issues against MARINE TER-  
18 HAROUTUNIAN aka Marine Terharoutunian aka Marine Pasmakian ("Respondent") alleges  
19 as follows:

20 1.

21 On or about June 17, 2015, Respondent made application to the Bureau of Real  
22 Estate of the State of California for a real estate salesperson license.

23  
24 (CRIMINAL CONVICTION)

25 2.

26 On or about March 9, 1990, in the Municipal Court of Van Nuys Courthouse  
27 Judicial District, County of Los Angeles, California, case no. 90P02294, Respondent was

- 1 -

In the Matter of the Application of Marine Ter-Haroutunian

1 convicted of violating California Penal Code section 484(a) (petty theft), a misdemeanor. Said  
2 crime bears a substantial relationship to the qualifications, functions, or duties of a real estate  
3 licensee under Section 2910, Title 10, Chapter 6, California Code of Regulations.

4 3.

5 The crime of which Respondent was convicted as alleged above constitutes  
6 cause for denial of Respondent's application for a real estate license under California Business  
7 and Professions Code sections 475(a)(2), 480(a), and 10177(b).

8  
9 (FAILURE TO REVEAL CONVICTION)

10 4.

11 In response to Question 27 of her license application, to wit: "HAVE YOU  
12 EVER BEEN CONVICTED (SEE PARAGRAPH ABOVE) OF ANY VIOLATION OF THE  
13 LAW AT THE MISDEMEANOR OR FELONY LEVEL? IF YES, COMPLETE ITEM 33  
14 WITH INFORMATION ON EACH CONVICTION," Respondent answered, "No," and failed  
15 to reveal the conviction described in Paragraph 2, above.

16 5.

17 Respondent's failure to reveal this conviction in her license application  
18 constitutes knowingly making false statements of material facts required to be revealed in said  
19 application, which is grounds for denial of the issuance of a license under California Business  
20 and Professions Code sections 475(a)(1), 480(d), and 10177(a).

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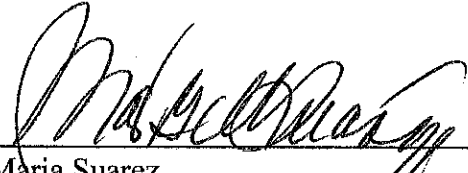
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1                   These proceedings are brought under the provisions of Section 10100, Division  
2 4 of the Business and Professions Code of the State of California and Sections 11500 through  
3 11528 of the California Government Code.

4                   WHEREFORE, the Complainant prays that the above-entitled matter be set for  
5 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to  
6 authorize the issuance of, and deny the issuance of, a real estate salesperson license to  
7 Respondent MARINE TER-HAROUTUNIAN and for such other and further relief as may be  
8 proper under other applicable provisions of law.

9                   Dated at Los Angeles, California: 5 October, 2015.

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12 \_\_\_\_\_  
13 Maria Suarez  
14 Supervising Special Investigator

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25 cc:   MARINE TER-HAROUTUNIAN  
26       Maria Suarez  
27       Sacto