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**FILED**

APR 20 2016

BUREAU OF REAL ESTATE

By *[Signature]*

BEFORE THE BUREAU OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

|                                     |   |                            |
|-------------------------------------|---|----------------------------|
| In the Matter of the Application of | ) | No. H-40212 LA             |
|                                     | ) |                            |
| DANIEL CHOR CHAN,                   | ) | <u>STATEMENT OF ISSUES</u> |
|                                     | ) |                            |
| Respondent.                         | ) |                            |
|                                     | ) |                            |

The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California, acting in her official capacity, for Statement of Issues against DANIEL CHOR CHAN ("Respondent") alleges as follows:

1.

On or about April 8, 2015, Respondent made application to the Bureau of Real Estate of the State of California for a real estate salesperson license.

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(CRIMINAL CONVICTION)

2.

On or about April 13, 2009, in the United States District Court, Central District of California, case no. CR 08-1479 DSF, Respondent was convicted of violating 18 U.S.C. section 2320(a) (trafficking in counterfeit goods), a felony. In part, Respondent was sentenced to 37 months imprisonment. Said crime bears a substantial relationship to the qualifications, functions, or duties of a real estate licensee under Section 2910, Title 10, Chapter 6, California Code of Regulations.

3.

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

These proceedings are brought under the provisions of Section 10100, Division 4 of the Business and Professions Code of the State of California and Sections 11500 through 11528 of the California Government 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 license to Respondent DANIEL CHOR CHAN and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California: 18 April, 2016.

  
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Maria Suarez  
Supervising Special Investigator

cc: DANIEL CHOR CHAN  
Maria Suarez  
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