

FILED

JUL 17 2017

BUREAU OF REAL ESTATE

By *CA Deloria*

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BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

* * *

13	In the Matter of the Application of)	No.H-40714 LA
14	PAUL DAVID WENDER,)	<u>STATEMENT OF ISSUES</u>
15	Respondent.)	
16)	

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18 The Complainant, Maris Suarez, a Supervising Special
19 Investigator of the State of California, for Statement of Issues
20 against PAUL DAVID WENDER (Respondent) is informed and alleges in
21 her official capacity as follows:
22

23 1. On or about August 8, 2016, Respondent applied to
24 the Bureau of Real Estate of the State of California for a real
25 estate salesperson license.
26
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1 2. On or about September 22, 2011, in the Superior
2 Court of California, County of Ventura, case no. 2011027977MA,
3 Respondent was convicted of violating Penal Code section 273.5(a)
4 (corporal injury to spouse).

5 3. On or about February 18, 2015, in the Superior
6 Court of California, County of Ventura, case no. 2014028864MA,
7 Respondent was convicted of violating Vehicle Code section
8 23152(a) (DUI).
9

10 4. On or about March 8, 2013, in case no. A1118442,
11 the Security Guard Registration issued to Respondent was revoked
12 by the Bureau of Security and Investigative Services, Department
13 of Consumer Affairs, State of California.
14

15 5. On or about November 4, 2011, the certification of
16 Respondent as a Nurse Assistant was revoked by the California
17 Department of Public Health
18

19 6. The matters alleged in paragraphs 2 and 3 above are
20 substantially related to the duties, functions and qualifications
21 of a real estate licensee.

22 7. The matters alleged in paragraphs 2 and 3 above are
23 grounds to deny Respondent's application under Sections 480(a)(1)
24 and 10177(b) of the California Business and Professions Code.
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1 8. The matters alleged in paragraphs 4 and 5 above are
2 grounds to deny Respondent's application under Section 10177(f)
3 of the California Business and Professions Code.

4 The Statement of Issues is brought under the provisions
5 of Section 10100, Division 4 of the Business and Professions Code
6 of the State of California and Sections 11500 through 11528 of
7 the Government Code.
8

9 WHEREFORE, the Complainant prays that the above-
10 entitled matter be set for hearing and, upon proof of the charges
11 contained herein, that the Commissioner refuse to authorize the
12 issuance of, and deny the issuance of, a real estate salesperson
13 license to Respondent, and for such other and further relief as
14 may be proper under the Provisions of law.
15

16 Dated at Los Angeles, California,

17 this 14th day of July, 2017.

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19
20 
21 Maria Suarez
22 Supervising Special Investigator
23
24

25 cc: Paul David Wender
26 Maria Suarez
27 Sacto.