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1 2 3 4 5	Kevin H. Sun, Counsel (SBN 276539) Department of Real Estate 320 West 4th Street, Suite 350 Los Angeles, California 90013-1105 Telephone: (213) 576-6913 Fax: (213) 576-6917 Attorney for Complainant
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9	BEFORE THE DEPARTMENT OF REAL ESTATE
10	STATE OF CALIFORNIA
	* * *
11	In the Matter of the Application of) No. H-41558 LA
12	In the Matter of the Application of) No. H-41558 LA
13	DEBORAH FUNDUM,) <u>STATEMENT OF ISSUES</u>
14)
15	Respondent.)
16	
17	The Complainant, Maria Suarez, a Supervising Special Investigator of the State
18	of California, for Statement of Issues against DEBORAH FUNDUM also known as Deborah
19	Langille and Deborah DeVille ("Respondent") alleges as follows:
20	1.
21	The Complainant, Maria Suarez, a Supervising Special Investigator of the State
22	of California, makes this Statement of Issues in her official capacity.
23	2.
24	All references to the "Code" are to the California Business and Professions Code
25	and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.
26	///
27	///
	STATEMENT OF ISSUES - 1 -

5.	
on of about september 20, 2018, Respondent made application to the	
- operations of rour Distate (Department) for a real estate salesperson needse.	
TIRST CAUSE FOR DENIAL	
(CRIMINAL CONVICTIONS)	
 4. 7 <u>April 16, 2002; Penal Code ("PC") Section 487(a) – Felony</u> 	
8 a. On or about February 21, 2002, in the Superior Court of California, Co	untrof
⁹ San Bernardino, Case No. FVI014684 , Respondent pled guilty to and was convicted for	
10 violation of PC Section 487(a) (grand theft by embezzlement), a felony.	
b. On or about April 16, 2002, the Court suspended the imposition of sent	ence
12 and placed Respondent on supervised probation for 60 months under certain terms and	
13 conditions, including, but not limited to, 135 days jail, restitution in the amount of \$5,71	4.99,
14 and payment of fines and fees.	
15 5.	
¹⁶ The crime of which Respondent was convicted, by its facts and circumsta	nces,
17 bears a substantial relationship under Section 2910, Title 10, Chapter 6, California Code	of
18 Regulations to the qualifications, functions or duties of a real estate licensee.	
¹⁹ 6.	
²⁰ The crime of which Respondent was convicted, as described in Paragraph	4,
21 constitutes cause for denial of Respondent's application for a real estate license under Ca	lifornia
Business and Professions Code sections 480(a)(1) and 10177(b).	
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24 ///	
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27 ///	
STATEMENT OF	ISSUES

1	SECOND CAUSE FOR DENIAL
2	(FAILURE TO DISCLOSE ALL CONVICTIONS)
3	7.
4	On or about September 26, 2018, Respondent submitted an application for a real
5	estate salesperson license. In response to Question 28, under "BACKGROUND
6	INFORMATION," of Respondent's license application, to wit, "HAVE YOU EVER BEEN
7	CONVICTED (SEE PARAGRAPH ABOVE) OF ANY VIOLATION OF THE LAW AT
8	THE MISDEMEANOR OR FELONY LEVEL? IF YES, COMPLETE ITEM 34 WITH
9	INFORMATION ON EACH CONVICTION," Respondent marked "NO" and failed to
10	disclose the conviction as alleged in Paragraph 4 above in Item 34 of her application.
11	8.
12	Respondent's failure to disclose the conviction, as set forth in Paragraph 4, in
13	her license application constitutes an attempt to procure a real estate license by fraud,
14	misrepresentation, or deceit, or by making a material misstatement of fact in an application,
15	which is grounds for denial of the issuance of a license under California Business and
16	Professions Code Section 10177(a).
17	12.
18	These proceedings are brought under the provisions of Section 10100, Division
19	4 of the Business and Professions Code of the State of California and Sections 11500 through
20	11528 of the California Government Code.
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	STATEMENT OF ISSUES

1	PRAYER
2	WHEREFORE, the Complainant prays that the above-entitled matter be set for
3	hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
4	authorize the issuance of, and deny the issuance of, a real estate salesperson license to
5	Respondent DEBORAH FUNDUM also known as Deborah Langille and Deborah DeVille and
6	for such other and further relief as may be proper under other applicable provisions of law.
7	A
8	Dated at Los Angeles, California this 6th day of Alenaber, 2019.
9	main
10	110 Del Munin
11	Maria Suarez Supervising Special Investigator
12	
13	cc: DEBORAH FUNDUM Maria Suarez
14	Sacto.
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