

FILED

MAR - 2 2020

DEPT. OF REAL ESTATE

By Carla Selous

JUDITH B. VASAN, Counsel (SBN 278115)
Department of Real Estate
320 West 4th Street, Suite 350
Los Angeles, California 90013-1105
Telephone: (213) 576-6982
Direct: (213) 576-6904
Fax: (213) 576-6917
Attorney for Complainant

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Application of)	No. H-41619 LA
)	
PAUL DANTE MARQUEZ,)	<u>STATEMENT OF ISSUES</u>
)	
Respondent.)	
)	

The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California, for Statement of Issues against PAUL DANTE MARQUEZ ("Respondent"), is informed and alleges in her official capacity as follows:

1.

On or about May 24, 2017, Respondent made application to the Department of Real Estate ("Department") of the State of California for a real estate salesperson license.

2.

All references to the "Code" are to the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code.

///

///

STATEMENT OF ISSUES

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

3.

On or about April 9, 2014, in the Superior Court of California, County of Los Angeles, Case No. 4GN00553, Respondent was convicted on a plea of nolo contendere for violation of Vehicle Code section 14601.1(a) (driving when privilege suspended or revoked), a misdemeanor. The court suspended the imposition of sentence and placed Respondent on summary probation for thirty-six (36) months on certain terms and conditions, including in part, performing 10 days of community labor in lieu of payment of fine.

4.

On or about September 21, 2015, in the Superior Court of California, County of Los Angeles, Case No. 5GN02293, Respondent was convicted on a plea of nolo contendere for violation of Penal Code sections 484(a) and 490.2 (petty theft of a value not exceeding \$950.00), a misdemeanor. The court suspended the imposition of sentence and placed Respondent on summary probation for two (2) years on certain terms and conditions, including in part, payment of fines and fees and staying away from JCPenney located at the Glendale Galleria.

5.

The crimes of which Respondent was convicted as described in Paragraphs 3 and 4 above, bear a substantial relationship under Section 2910, Title 10, Chapter 6, of the California Code of Regulations to the qualifications, functions or duties of a real estate licensee.

6.


The crimes of which Respondent was convicted, as described in Paragraphs 3 and 4 above, constitute cause for denial of Respondent's application for a real estate license under California Business and Professions Code sections 480(a)(1) and 10177(b).

7.

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.

1 WHEREFORE, the Complainant prays that the above-entitled matter be set for
2 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
3 authorize the issuance of, and deny the issuance of, a real estate salesperson license to
4 Respondent PAUL DANTE MARQUEZ and for such other and further relief as may be proper
5 under other applicable provisions of law.

6
7 Dated at Los Angeles, California this 25th day of February, 2020.

8
9
10 
11 Maria Suarez
12 Supervising Special Investigator
13
14
15
16
17
18
19
20
21
22
23
24

25 cc: PAUL DANTE MARQUEZ
26 Maria Suarez
27 Sacto.