

FILED

JAN 11 2023

DEPT. OF REAL ESTATE
By 

DIANE LEE, Counsel (SBN 247222)
Department of Real Estate
320 West 4th Street, Suite 350
Los Angeles, California 90013

Telephone: (213) 576-6982
(Direct) (213) 576-6907

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Application of) No. H-42470 LA
)
RUSSELL T. PASOS,) STATEMENT OF ISSUES
)
Respondent.)
)

The Complainant, Jason Parson, a Supervising Special Investigator of the State of California, acting in his official capacity, for Statement of Issues against RUSSELL T. PASOS aka Russell Tex Pasos ("Respondent") alleges as follows:

1.

On or about July 14, 2021, Respondent made application to the Department of Real Estate of the State of California for a real estate salesperson license.

(CRIMINAL CONVICTIONS)

2.

On or about June 22, 2020, in the Superior Court of California, County of San Bernardino, case no. 16CR-046361, Respondent was convicted of violating California Penal Code section 245(a)(1) (assault with a deadly weapon, to wit: a motor vehicle), a misdemeanor, and California Vehicle Code section 23152(b) (driving with a blood alcohol level of 0.08

1 percent or more). Respondent was sentenced, in part, to serve three (3) years of summary
2 probation, attend and complete AB541 alcohol education program, stay away from the victim,
3 and pay restitution and various fines and fees. Said crimes bear a substantial relationship to the
4 qualifications, functions, or duties of a real estate licensee under Section 2910, Title 10,
5 Chapter 6, California Code of Regulations.


6 3.

7 The crimes of which Respondent was convicted as alleged above in Paragraph 2,
8 above, constitute cause for denial of Respondent's application for a real estate license under
9 California Business and Professions Code sections 475(a)(2), 480(a), and 10177(b).

10 These proceedings are brought under the provisions of Section 10100, Division
11 4 of the Business and Professions Code of the State of California and Sections 11500 through
12 11528 of the California Government Code.

13 WHEREFORE, the Complainant prays that the above-entitled matter be set for
14 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
15 authorize the issuance of, and deny the issuance of, a real estate salesperson license to
16 Respondent RUSSELL T. PASOS and for such other and further relief as may be proper under
17 other applicable provisions of law.

18 Dated at Los Angeles, California: January 4, 2023.

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21 _____
22 Jason Parson
23 Supervising Special Investigator
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25 cc: RUSSELL T. PASOS
26 Jason Parson
27 Sacto