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DEPT. OF REAL ESTATE

By\_\_\_\_\_

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BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

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In the Matter of the Application of:

TRAYSHUN DAUVIELE RICHMOND,

Respondent.

No. H-42747-LA

STATEMENT OF ISSUES

Complainant, Jason Parson, a Supervising Special Investigator for the Department of Real Estate ("Department") of the State of California, for cause of Statement of Issues against TRAYSHUN DAUVIELE RICHMOND, also known as Trayshun Richmond ("Respondent"), is informed and alleges in his official capacity as follows:

1. On or about November 15, 2022, Respondent made application to the Department for a real estate salesperson license.

## CAUSE FOR DENIAL OF APPLICATION

(CRIMINAL CONVICTION)

2. On or about December 6, 2016, in the Criminal Court for Shelby County, Tennessee, in the 30<sup>th</sup> Judicial District at Memphis, Case No. 16 04579, Respondent was convicted based on a guilty plea for violation of Tennessee Code Annotated ("T.C.A.") section 39-17-434 (unlawful possession of a controlled substance with intent to sell 300 grams or more of Methamphetamine), a felony. The court sentenced Respondent to serve eight (8) years in the Tennessee Department of Correction, however, the court suspended sentence and placed Respondent on supervised probation

for eight (8) years, subject to terms and conditions including but not limited to: performing 200 hours of community service; maintaining verifiable employment; submitting to random drug screens; probation supervision to be transferred to Compton or Los Angeles, California; and payment of a \$2,000 fine.

- 3. In aggravation, on or about April 12, 2016, in the Los Angeles County Superior Court, Case No. 6TR02168, a complaint was filed against Respondent for violation of Vehicle Code section 14601.1(a) (driving on a suspended and/or revoked license), a misdemeanor. On or about March 17, 2017, the court ordered the complaint amended to allege the violation of Vehicle Code section 14601.1(a) as an infraction pursuant to Penal Code section 17(d), and Respondent was convicted based on his plea of nolo contendere to violation of Vehicle Code section 14601.1(a). The court sentenced Respondent to serve three (3) days in the Los Angeles County Jail, with credit for three (3) days.
- 4. The crime for which Respondent was convicted, as described in Paragraph 2 above, by its facts and circumstances, bears a substantial relationship under Regulation 2910 to the qualifications, functions, or duties of a real estate licensee.
- 5. The crime for which Respondent was convicted, as described in Paragraph 2 above, constitutes 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).
- 6. 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.

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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 TRAYSHUN DAUVIELE RICHMOND and for such other and further relief as may be proper under other applicable provisions of law. Dated at Los Angeles, California on September 28, 2023. Supervising Special Investigator TRAYSHUN DAUVIELE RICHMOND cc: Mulhearn Realtors Inc. Jason Parson Sacto. 

STATEMENT OF ISSUES