1 2 3 4 5 6	KYLE T. JONES, Counsel (SBN 300751) Department of Real Estate P.O. BOX 137007 Sacramento, CA 95813-7007 Telephone: (916) 576-8700 (916) 263-3767 (Fax) (916) 576-7840 (Direct) APR 0 8 2020 DEPARTMENT OF REALIESTATE By D. LICLUS
7	
8	BEFORE THE DEPARTMENT OF REAL ESTATE
9	STATE OF CALIFORNIA
10 11	* * * In the Matter of the Application of
12 13 14	AMY RENEA EDWARDS, Output Description: Output Description: Output Description: Output Output Description: Output Output Description: Output Outp
15	The Complainant, BRENDA SMITH, acting in her official capacity as a
16	Supervising Special Investigator of the State of California, for this Statement of Issues against
17	AMY RENEA EDWARDS ("Respondent"), is informed and alleges as follows:
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19	On or about April 22, 2019, Respondent made application to the Department of
20	Real Estate of the State of California for a real estate salesperson license.
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22	On or about September 22, 2017, in the Superior Court of the State of California,
23	County of Los Angeles, Case No. 7AR00801, Respondent was convicted of violating Section
24	12500(a) (drive without license) of the California Vehicle Code, a misdemeanor and a crime that
25	bears a substantial relationship to the qualifications, functions or duties of a real estate licensee
26	pursuant to Section 2910, Title 10, of the California Code of Regulations ("Regulations").
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On or about June 26, 2013, in the Superior Court of the State of California, County of Kern, Case No. BM821035A, Respondent was convicted of violating Section 12500(a) of the California Vehicle Code, a misdemeanor and a crime that bears a substantial relationship to the qualifications, functions or duties of a real estate licensee pursuant to Section 2910 of the Regulations.

MATTERS IN AGGRAVATION

On or about September 19, 2008, in the Superior Court of the State of California, County of Kern, Case No. BM736014A, Respondent was convicted of violating Section 14601.1(a) (drive while license suspended) of the California Vehicle Code, a misdemeanor.

On or about August 27, 2008, in the Superior Court of the State of California, County of Kern, Case No. BM732964A, Respondent was convicted of violating Section 23152(a) (driving under the influence) of the California Vehicle Code, a misdemeanor.

On or about August 21, 2006, in the Superior Court of the State of California, County of Kern, Case No. BM694089A, Respondent was convicted of violating Section 12500(a) of the California Vehicle Code, a misdemeanor.

On or about January 6, 2006, in the Superior Court of the State of California, County of Kern, Case No. BM679805A, Respondent was convicted of violating Section 14601.1(a) of the California Vehicle Code, a misdemeanor.

On or about July 8, 2005 in the Superior Court of the State of California, County of Kern, Case No. BM658143A, Respondent was convicted of violating Section 20002(a) (hit and run) of the California Vehicle Code, a misdemeanor.

GROUNDS FOR DENIAL

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Respondent's criminal convictions described above in Paragraphs 2 and 3 constitute cause for denial of Respondent's application for a real estate salesperson license pursuant to the provisions of Sections 480(a)(1) (conviction of crime) and 10177(b) (conviction of crime) of the California Business and Professions Code.

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/broker license to Respondent, and for such other and further relief as may be proper under applicable provisions of law.

BRENDA SMITH

Supervising Special Investigator

Dated at Fresno, California,

this 19 day of March, 2020.

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DISCOVERY DEMAND

Pursuant to Sections 11507.6, et seq. of the Administrative Procedure Act, the Department hereby makes demand for discovery pursuant to the guidelines set forth in the Administrative Procedure Act. Failure to provide Discovery to the Department may result in the exclusion of witnesses and documents at the hearing or other sanctions that the Office of Administrative Hearings deems appropriate.