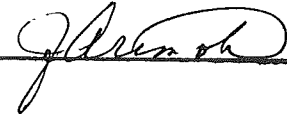


MARY F. CLARKE, Counsel (SBN 186744)
Bureau of Real Estate
1651 Exposition Blvd.
P. O. Box 137007
Sacramento, CA 95813-7007

FILED

FEB 11 2014

BUREAU OF REAL ESTATE

By 

Telephone: (916) 263-8670 (Main)
-or- (916) 263-7303 (Direct)
-or- (916) 263-3767 (Fax)

BEFORE THE
BUREAU OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Application of)
RANDY TIEU LONG LACY,)
Respondent.)

NO. H- 6080 SAC
STATEMENT OF ISSUES

The Complainant, TRICIA SOMMERS, a Deputy Real Estate Commissioner (herein "Complainant"), of the State of California, Bureau of Real Estate (herein "the Bureau"), for Statement of Issues against Respondent RANDY TIEU LONG LACY (herein "Respondent"), is informed and alleges as follows:

1

Complainant makes this Statement of Issues in her official capacity.

2

Respondent made application to the Bureau for a real estate salesperson license on about February 19, 2013.

3

On about March 30, 1993, in the Superior Court, State of California, County of Sacramento, Respondent was convicted of the crime of Carrying a Loaded Firearm in Public, in

1 violation of Section 12031 of the Penal Code, a felony that bears a substantial relationship under
2 Section 2910, Chapter 6, Title 10, California Code of Regulations (herein "the Regulations"),
3 to the qualifications, functions or duties of a real estate licensee.

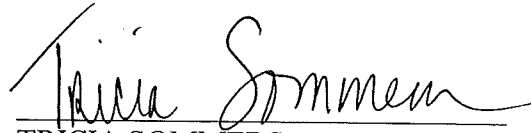
4 4

5 On about March 6, 1996, in United States District Court, Eastern District of
6 California, Respondent was convicted of the crime of Possession of Methamphetamine with
7 Intent to Distribute, in violation of Section 841(a)(1) of Title 21 of the U.S. Code, a crime that
8 bears a substantial relationship under Section 2910 of the Regulations, to the qualifications,
9 functions or duties of a real estate licensee.

10 5

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

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

18
19 

20 TRICIA SOMMERS
21 Deputy Real Estate Commissioner

22 Dated at Sacramento, California,
23 this 30th day of January, 2014.

24 DISCOVERY DEMAND

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