1	KYLE T. JONES, Counsel (SBN 300751)
2	Department of Real Estate P.O. BOX 137007
3	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)
4	Telephone: (916) 576-8700
5	(916) 263-3767 (Fax)
6	(916) 576-7840 (Direct)
7	8
8	BEFORE THE DEPARTMENT OF REAL ESTATE
9	8
	STATE OF CALIFORNIA
10	* * *
11	In the Matter of the Application of
12	) NO. H-7087 SAC CHRISTOPHER TODD HOWARD, )
13	) <u>STATEMENT OF ISSUES</u>
14	Respondent. )
15	The Complainant, TRICIA D. PARKHURST, acting in her official capacity as a
16	Supervising Special Investigator of the State of California, for this Statement of Issues against
17	CHRISTOPHER TODD HOWARD ("Respondent"), is informed and alleges as follows:
18	. 1
19	On or about August 20, 2020, Respondent made application to the Department of
20	Real Estate of the State of California for a real estate salesperson license.
21	2
22	On or about February 28, 2018, in the Superior Court of the State of Georgia,
23	County of Clarke, Case No. SU17CR0431-N, Respondent was convicted of two counts of
24	violating Section 40-6-391/40-6-394 (serious injury by vehicle-dui) of the Official Code of
25	Georgia Annotated, felonies and crimes that bear a substantial relationship to the qualifications,
26	functions or duties of a real estate licensee pursuant to Section 2910, Title 10, of the California
27	Code of Regulations.

## **GROUNDS FOR DENIAL**

Respondent's criminal conviction described above in Paragraph 2 constitutes 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.

TRICIA D. PARKHURST

Supervising Special Investigator

Dated at Sacramento, California, this day of 2021

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

**DISCOVERY DEMAND** 

Administrative Hearings deems appropriate.