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8 BEFORE THE DEPARTMENT OF REAL ESTATE  
9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Application of	)	No. H- 7301 SAC
12 SOULIGMA PHOTHONG,	)	
13 Respondent.	)	<u>STATEMENT OF ISSUES</u>
14	)	

15 The Complainant, TRICIA D. PARKHURST, a Supervising Special Investigator  
16 of the State of California, for Statement of Issues against SOULIGMA PHOTHONG,  
17 (Respondent), alleges as follows:

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19 Complainant makes this Statement of Issues in her official capacity.

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21 On or about November 15, 2022, Respondent made application to the  
22 Department of Real Estate of the State of California (Department) for a real estate salesperson  
23 license.

24 3

25 On or about July 27, 1001, in the Superior Court of the State of California,  
26 County of Sacramento, Case No. 98F05682, Respondent was convicted of violating Section  
27 192(A) of the California Penal Code (voluntary manslaughter), with enhancements pursuant to

1 Section 12022(a)(1) of the California Penal Code (use of firearm), and Section 186.22(b)(1) of  
2 the California Penal Code (commit felony/street gang), all felonies and crimes which bear a  
3 substantial relationship under Section 2910, Title 10, California Code of Regulations to the  
4 qualifications, functions or duties of a real estate licensee.

5 4

6 Each conviction that Respondent suffered, as set forth in Paragraph 3, above, fall  
7 under the definition of Serious Felony, pursuant to Section 1192.7(c) of the California Penal  
8 Code, and are therefore chargeable under Section 480(A) of the Code

9 5

10 Respondent's criminal convictions, as described in Paragraph 3, above, constitute  
11 cause for denial of his application for a real estate license under Sections 10177(b) (further  
12 grounds for disciplinary action-conviction of crime) and 480(a) (conviction of crime) of the  
13 Code.

14 MATTERS IN AGGRAVATION

15 6

16 On or about December 19, 2016, in Superior Court of State of California, County  
17 of Sacramento, Case No. 16MI022222, Respondent was convicted of violating Section 23152(b)  
18 of the California Vehicle Code (driving under the influence of alcohol or a drug), a  
19 misdemeanor.

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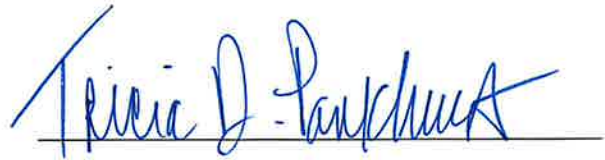
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1                   WHEREFORE, Complainant prays that the above-entitled matter be set for  
2 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to  
3 authorize the issuance of, and deny the issuance of a real estate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

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8 TRICIA D. PARKHURST

9 Supervising Special Investigator

10 Dated at Sacramento, California,  
11 this 20th day of October, 2023.