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FILED

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DEPT. OF REAL ESTATE

By 

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Application of

CHRISTINE ASHLEY SMITH,

Respondent.

DRE No. H-42957 LA

STATEMENT OF ISSUES

The Complainant, Jason Parson, a Supervising Special Investigator for the Department of Real Estate of the State of California, brings this Statement of Issues in his official capacity against CHRISTINE ASHLEY SMITH ("Respondent"), is informed and alleges as follows:

1. All references to the "Code" are to the California Business and Professions Code, all references to the "Real Estate Law" are to Part 1 of Division 4 of the Code, and all references to "Regulations" are to Title 10, Chapter 6, of the California Code of Regulations.

STATEMENT OF FACTS

2. Respondent made application to the Department for a real estate salesperson license on or about July 1, 2022.

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Cause for Denial – Six Convictions

3. On or about March 16, 2020, before the Justice Court, Las Vegas Township Clark County, State of Nevada, Case No. 20M00841X, Respondent plead guilty to and was convicted of violating CCC 12.08.020 - NOC 56702 (soliciting prostitution), a misdemeanor.

4. On or about February 12, 2020, before the Justice Court, Las Vegas Township Clark County, State of Nevada, Case No. 19T12090, Respondent plead no contest to and was convicted of violating NRS 207.200 53166 (trespass, not amounting to burglary), a misdemeanor.

5. On or about December 11, 2019, before the Henderson Municipal Court, Clark County, State of Nevada, Case No. 19TR024255, Respondent plead guilty to and was convicted of NRS 483.550 53720 (drive without valid driver's license) and NRS 485.330 54099 (operate motor vehicle when registration suspended), both misdemeanors.

6. On or about September 13, 2018, before the Justice Court, Las Vegas Township Clark County, State of Nevada, Case No. 18M04982X, Respondent plead no contest to and was convicted of violating (NRS 484C.110, NRS 484C.400, 484C.105 - NOC 53900) (driving under the influence of alcohol and/or controlled or prohibited substance, 1st offense), a misdemeanor.

7. On or about April 24, 2018, before the Superior Court of California, County of Los Angeles, Case No. 8CJ08374, Respondent plead no contest to and was convicted of violating Penal Code section 647(B)(1) (solicit prostitution), a misdemeanor.

8. On or about March 18, 2009, before the District Court, of Clark County, in the State of Nevada, Case No. C251173, Respondent plead guilty to and was convicted of violating NRS 205.270 (Larceny from the person), a Category C felony.

9. The convictions alleged above in Paragraphs 3 through 8, and the circumstances surrounding said convictions, are substantially related to the qualifications, functions, or duties

1 of a real estate licensee under the California Code of Regulations, Title 10, Chapter 6, sections
2 2910 and/or 2910.5.

3 10. The crimes of which Respondent was convicted, as alleged above in Paragraphs 3
4 through 8, constitute cause for the denial of Respondent's application for a real estate
5 salesperson license pursuant to Business and Professions Code sections 475(a)(2), 480, and
6 10177(b).

7 In Aggravation – 53 Misdemeanor Convictions

8 11. On or about May 30, 2017, before the Justice Court, Las Vegas Township Clark
9 County, State of Nevada, Case No. 17M05701X, Respondent plead guilty to and was convicted
10 of violating NRS 201.354 -NOC 51015 (soliciting prostitution), a misdemeanor.

11 12. On or about December 05, 2016, before the Justice Court, Las Vegas Township
12 Clark County, State of Nevada, Case No. 16M30720X, Respondent plead guilty to and was
13 convicted of violating NRS 207.200 53166 (trespass, not amounting to burglary), a
14 misdemeanor.

15 13. On or about June 1, 2016, before the Justice Court, Las Vegas Township Clark
16 County, State of Nevada, Case No. 16M06302X, Respondent plead guilty to and was convicted
17 of violating NRS 201.354 -NOC 51015 (soliciting prostitution), a misdemeanor.

18 14. On or about March 18, 2016, before the Justice Court, Las Vegas Township Clark
19 County, State of Nevada, Case No. 15M25447X, Respondent plead guilty to and was convicted
20 of violating NRS 201.354 -NOC 51015 (soliciting prostitution), a misdemeanor.

21 15. On or about February 10, 2015, before the Superior Court of California, County
22 of Los Angeles, Case No. 4PS03888, Respondent plead no contest to and was convicted of
23 violating Penal Code section 653.22(A) (solicit prostitution), a misdemeanor.

1 16. On or about August 04, 2014, before the Superior Court of California, County of
2 Los Angeles, Case No. 4PK03199, Respondent plead no contest to and was convicted of
3 violating Penal Code section 647(b) (disorderly conduct: solicit prostitution), a misdemeanor.

4 17. On or about July 18, 2014, before the Superior Court of California, County of Los
5 Angeles, Case No. 4PS01907, Respondent plead no contest to and was convicted of violating
6 Penal Code section 647(b) (disorderly conduct: solicit prostitution), a misdemeanor.

7 18. On or about May 05, 2014, before the Superior Court of California, County of
8 Los Angeles, Case No. 4PS00568, Respondent plead no contest to and was convicted of
9 violating Penal Code section 647(b) (disorderly conduct: solicit prostitution), a misdemeanor.

10 19. On or about March 19, 2014, before the Justice Court, Las Vegas Township Clark
11 County, State of Nevada, Case No. 14M05370X, Respondent plead guilty to and was convicted
12 of violating NRS 207.200 53166 (trespass, not amounting to burglary), a misdemeanor.

13 20. On or about January 17, 2014, before the Justice Court, Las Vegas Township
14 Clark County, State of Nevada, Case No. 13M00813X, Respondent plead guilty to and was
15 convicted of illegal parking, a misdemeanor.

16 21. On or about October 03, 2013, before the Justice Court, Las Vegas Township
17 Clark County, State of Nevada, Case No. 11M48289X, Respondent plead no contest to and was
18 convicted of violating NRS 201.354 (soliciting prostitution), a misdemeanor.

19 22. On or about August 27, 2013, before the Superior Court of California, County of
20 San Bernardino, Case No. MWV130305, Respondent plead guilty to and was convicted of
21 violating Penal Code section 148(A)(1) (willfully resist, delay, or obstruct a public officer), a
22 misdemeanor.

1 23. On or about August 13, 2013, before the Superior Court of California, County of
2 Los Angeles, Case No. 3PK03471, Respondent plead no contest to and was convicted of
3 violating Penal Code section 653.22(A) (solicit prostitution), a misdemeanor.

4 24. On or about August 01, 2013, before the Superior Court of California, County of
5 Los Angeles, Case No. 3PY03685, Respondent plead no contest to and was convicted of
6 violating Penal Code section 653.22(A) (solicit prostitution), a misdemeanor.

7 25. On or about April 15, 2013, before the Superior Court of California, County of
8 Los Angeles, Case No. 3PS00275, Respondent plead no contest to and was convicted of
9 violating Penal Code section 653.22(A) (solicit prostitution), a misdemeanor.

10 26. On or about October 9, 2012, before the Superior Court of California, County of
11 Los Angeles, Case No. 2PY05392, Respondent plead no contest to and was convicted of
12 violating Penal Code section 653.22(A) (solicit prostitution), a misdemeanor.

13 27. On or about October 3, 2012, before the Superior Court of California, County of
14 Los Angeles, Case No. 2PS03127, Respondent plead no contest to and was convicted of
15 violating Penal Code section 653.22(A) (solicit prostitution), a misdemeanor.

16 28. On or about July 23, 2012, before the Superior Court of California, County of Los
17 Angeles, Case No. 2PK03511, Respondent plead no contest to and was convicted of violating
18 Penal Code section 148(A)(1) (willfully resist, delay, or obstruct a public officer), a
19 misdemeanor.

20 29. On or about July 09, 2012, before the Superior Court of California, County of Los
21 Angeles, Case No. 2P202060, Respondent plead no contest to and was convicted of violating
22 Penal Code section 653.22 (solicit prostitution), a misdemeanor.

1 30. On or about February 22, 2012, before the Superior Court of California, County
2 of Los Angeles, Case No. 2IG00900, Respondent plead no contest to and was convicted of
3 violating Penal Code section 472 (forgery or counterfeiting driver's license), a misdemeanor.

4 31. On or about January 18, 2012, before the Justice Court, Las Vegas Township
5 Clark County, State of Nevada, Case No. 11M45885X, Respondent plead guilty to and was
6 convicted of violating NRS 453.336 (possession of controlled substance – marijuana, less than
7 one ounce), a misdemeanor.

8 32. On or about November 7, 2011, before the Superior Court of California, County
9 of Santa Clara, Case No. C1115908, Respondent plead no contest to and was convicted of
10 violating Penal Code section 653.22 (solicit prostitution), a misdemeanor.

11 33. On or about October 13, 2011, before the Superior Court of California, County of
12 Los Angeles, Case No. 1PY05330, Respondent plead no contest to and was convicted of
13 violating Penal Code section 647(b) (disorderly conduct: solicit prostitution), a misdemeanor.

14 34. On or about March 25, 2011, before the Superior Court of California, County of
15 San Bernardino, Case No. MWV904340, Respondent plead guilty to and was convicted of
16 violating Penal Code section 653.22(A) (loitering with intent to engage in prostitution), a
17 misdemeanor.

18 35. On or about February 28, 2011, before the Superior Court of California, County
19 of Los Angeles, Case No. OPS04021, Respondent plead no contest to and was convicted of
20 violating Penal Code section 647(b) (disorderly conduct: solicit prostitution), a misdemeanor.

21 36. On or about February 03, 2011, before the Superior Court of California, Orange
22 County, Case No. 10WM12781, Respondent plead guilty to and was convicted of violating Penal
23 Code section 653.22(a) (loitering with intent to commit prostitution) and Penal Code section
24 853.7 (failure to appear), misdemeanors.

1 37. On or about February 03, 2011, before the Superior Court of California, Orange
2 County, Case No. 10CM10670, Respondent plead guilty to and was convicted of violating Penal
3 Code section 647(b) (agreeing to engage in prostitution), a misdemeanor.

4 38. On or about January 10, 2011, before the Superior Court of California, County of
5 Los Angeles, Case No. 1PY00015, Respondent plead guilty to and was convicted of violating
6 Penal Code section 647(B) (disorderly conduct: solicit prostitution), a misdemeanor.

7 39. On or about August 18, 2009, before the Superior Court of California, County of
8 Los Angeles, Case No. 9PY05622, Respondent plead guilty to and was convicted of violating
9 Penal Code section 647(B) (disorderly conduct: solicit prostitution), a misdemeanor.

10 40. On or about June 15, 2009, before the Superior Court of California, County of
11 Los Angeles, Case No. 9HY00570, Respondent plead no contest to and was convicted of
12 violating Penal Code section 647(B) (disorderly conduct: solicit prostitution), a misdemeanor.

13 41. On or about December 10, 2008, before the Justice Court, Las Vegas Township
14 Clark County, State of Nevada, Case No. 08M36741X, Respondent plead guilty to and was
15 convicted of violating NRS 201.354 (soliciting prostitution), a misdemeanor.

16 42. On or about November 24, 2008, before the Justice Court, Las Vegas Township
17 Clark County, State of Nevada, Case No. 08M33692X, Respondent plead guilty to and was
18 convicted of violating NRS 201.354 (soliciting prostitution), a misdemeanor.

19 43. On or about November 19, 2008, before the Justice Court, Las Vegas Township
20 Clark County, State of Nevada, Case No. 08M33020X, Respondent plead guilty to and was
21 convicted of violating NRS 201.354 (soliciting prostitution), a misdemeanor.

22 44. On or about November 03, 2008, before the Justice Court, Las Vegas Township
23 Clark County, State of Nevada, Case No. 08M30580X, Respondent plead guilty to and was
24 convicted of violating NRS 201.354 (soliciting prostitution), a misdemeanor.

1 45. On or about September 3, 2008, before the Justice Court, Las Vegas Township
2 Clark County, State of Nevada, Case No. 08M16869X, Respondent plead guilty to and was
3 convicted of violating NRS 201.354 (soliciting prostitution), a misdemeanor.

4 46. On or about August 08, 2008, before the Superior Court of California, County of
5 Los Angeles, Case No. 8CP06418, Respondent plead no contest to and was convicted of
6 violating Penal Code section 647(B) (disorderly conduct: solicit prostitution), a misdemeanor.

7 47. On or about July 1, 2008, before the Superior Court of California, County of Los
8 Angeles, Case No. 8PS00575, Respondent plead no contest to and was convicted of violating
9 Penal Code section 647(B) (disorderly conduct: solicit prostitution), a misdemeanor.

10 48. On or about January 22, 2008, before the Superior Court of California, County of
11 Los Angeles, Case No. 7PY07755, Respondent plead no contest to and was convicted of
12 violating Penal Code section 647(B) (disorderly conduct: solicit prostitution), a misdemeanor.

13 49. On or about January 18, 2008, before the Superior Court of California, County of
14 Los Angeles, Case No. 8PK00367, Respondent plead guilty to and was convicted of violating
15 Penal Code section 647(B) (disorderly conduct: solicit prostitution), a misdemeanor.

16 50. On or about November 06, 2007, before the Justice Court, Las Vegas Township
17 Clark County, State of Nevada, Case No. 07M15198X, Respondent plead guilty to and was
18 convicted of violating NRS 201.354 (soliciting prostitution), a misdemeanor.

19 51. On or about November 6, 2007, before the Justice Court, Las Vegas Township
20 Clark County, State of Nevada, Case No. 07M128847X, Respondent plead guilty to and was
21 convicted of violating CCC 12.08.030 (loitering for the purpose of soliciting), a misdemeanor.

22 52. On or about November 06, 2007, before the Justice Court, Las Vegas Township
23 Clark County, State of Nevada, Case No. 07M00322X, Respondent plead guilty to and was
24 convicted of violating NRS 201.354 (soliciting prostitution), a misdemeanor.

1 53. On or about October 22, 2007, before the Superior Court of California, County of
2 Los Angeles, Case No. 7AH03630, Respondent plead no contest to and was convicted of
3 violating Penal Code section 647(B) (disorderly conduct: solicit prostitution), a misdemeanor.

4 54. On or about July 19, 2007, before the Superior Court of California, County of Los
5 Angeles, Case No. 7PY03833, Respondent plead no contest to and was convicted of violating
6 Penal Code section 653.22(A) (loitering with intent to solicit prostitution), a misdemeanor.

7 55. On or about May 22, 2007, before the Superior Court of California, County of
8 Los Angeles, Case No. 7PK02584, Respondent plead guilty to and was convicted of violating
9 Penal Code section 653.22(A) (loitering with intent to solicit prostitution), a misdemeanor.

10 56. On or about May 18, 2007, before the Superior Court of California, County of
11 Los Angeles, Case No. 7CA07566, Respondent plead no contest to and was convicted of
12 violating Penal Code section 653.22(A) (loitering with intent to solicit prostitution), a
13 misdemeanor.

14 57. On or about May 11, 2007, before the Justice Court, Las Vegas Township Clark
15 County, State of Nevada, Case No. 06M25079X, Respondent plead guilty to and was convicted
16 of violating two counts of NRS 201.354 (soliciting prostitution), misdemeanors.

17 58. On or about February 13, 2007, before the Justice Court, Las Vegas Township
18 Clark County, State of Nevada, Case No. 06M30889X, Respondent plead guilty to and was
19 convicted of violating NRS 201.354 (soliciting prostitution), a misdemeanor.

20 59. On or about January 26, 2007, before the Superior Court of California, County of
21 Los Angeles, Case No. 7CA04579, Respondent plead no contest to and was convicted of
22 violating Penal Code section 653.22(A) (loitering with intent to solicit prostitution), a
23 misdemeanor.

1 60. On or about January 22, 2007, before the Superior Court of California, County of
2 Los Angeles, Case No. 7SR00373, Respondent plead no contest to and was convicted of
3 violating Penal Code section 647(A) (disorderly conduct: solicit lewd act), a misdemeanor.

4 61. On or about November 28, 2006, before the Justice Court, Las Vegas Township
5 Clark County, State of Nevada, Case No. 06M24355X, Respondent plead guilty to and was
6 convicted of violating NRS 201.354 (soliciting prostitution), a misdemeanor.

7 62. On or about October 31, 2006, before the County Criminal Court, Harris County,
8 State of Texas, Case No. 1413042, Respondent plead guilty to and was convicted of violating
9 NCIC 4004 03 (prostitution), a Class B misdemeanor.

10 63. On or about October 9, 2006, before the Justice Court, Las Vegas Township Clark
11 County, State of Nevada, Case No. 06M21166X, Respondent plead guilty to and was convicted
12 of violating NRS 201.354 (soliciting prostitution), a misdemeanor.

13 These proceedings are brought under the provisions of Section 10100, Division 4 of the
14 Business and Professions Code of the State of California and Sections 11500 through 11528 of
15 the California Government Code.

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

20 Dated 11/12/24 at Los Angeles, California.

21 
22 JASON PARSON
23 Supervising Special Investigator

24 cc: Christine Ashley Smith
Jason Parson
Sacto.