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FILED

MAR 27 2019

DEPARTMENT OF REAL ESTATE
By *L. Jones*

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)
12 STACY COOPER GALLUZI,) No. H-12376 SF
13) ACCUSATION
14 Respondent.)

15 The Complainant, ROBIN S. TANNER, acting in her official capacity as a
16 Supervising Special Investigator of the State of California, for this Accusation against STACY
17 COOPER GALLUZI ("Respondent"), is informed and alleges as follows:

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19 Respondent is presently licensed and/or has license rights under the Real Estate
20 Law, Part 1 of Division 4 of the California Business and Professions Code ("Code"), as a real
21 estate broker.

22 2

23 On or about August 16, 2017, Respondent submitted a broker renewal application
24 to the Department of Real Estate ("Department").

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26 In response to Question 17 of said broker renewal application to wit: "ARE
27 THERE CRIMINAL CHARGES PENDING AGAINST YOU AT THIS TIME, OR ARE YOU

The facts alleged in Paragraph 5, above, constitute cause under Sections 490 (conviction of substantially related crime) and 10177(b) (conviction of substantially related crime) of the Code for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

Respondent's failure to report the conviction to the Department, as described in Paragraph 6, above, violates Section 10186.2 (a) (conviction reporting requirements) of the Code, and constitutes cause under Section 10177(d) (willful disregard or violation of Real Estate Law) of the Code for suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

MATTER IN AGGRAVATION

On or about September 24, 2008, in the Superior Court of the State of California, County of Sonoma, Case No. SCR-538946-1, Respondent was convicted of violating Section 23105.5 (reckless driving-with alcohol) of the California Vehicle Code, a misdemeanor.

COST RECOVERY

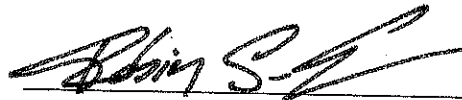
The Department will seek to recover the costs of the investigation and prosecution of this case pursuant to Section 10106 of the Code which provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, the Commissioner may request the administrative law judge to direct a licensee found to have committed a violation of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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1 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
2 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary
3 action against all licenses and license rights of Respondent under the Real Estate Law, for the
4 cost of investigation and enforcement as permitted by law, and for such other and further relief as
5 may be proper under other provisions of law.

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8 ROBIN S. TANNER
9 Supervising Special Investigator

10 Dated at Oakland, California,
11 this 25th day of March, 2019.

12
13 DISCOVERY DEMAND

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