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**FILED**

MAY 17 2019

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DEPARTMENT OF REAL ESTATE  
By B. Nicholas

8 BEFORE THE DEPARTMENT OF REAL ESTATE  
9 STATE OF CALIFORNIA

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

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

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

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

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In response to Question 17 of said broker renewal application to wit: "ARE THERE CRIMINAL CHARGES PENDING AGAINST YOU AT THIS TIME, OR ARE YOU CURRENTLY AWAITING JUDGMENT AND SENTENCING FOLLOWING ENTRY OF A PLEA OR JURY VERDICT? IF YES, COMPLETE ITEM 22," Respondent concealed and failed to disclose the pending charges described below in paragraph 4.

On or about April 24, 2017, in the Superior Court of the State of California, County of Sonoma, Case No. SCR-701827-1, Respondent was charged with violating Section 273a(a) (abusing or endangering health of a child) of the California Penal Code and Section 23153(a) (driving under the influence of alcohol-with injury) of the California Vehicle Code, felonies. The charges against Respondent were disposed of on or about March 28, 2018.

On or about March 28, 2018, in the Superior Court of the State of California, County of Sonoma, Case No. SCR-701827-1, Respondent was convicted of violating Section 273a(a) of the California Penal Code and Section 23153(a) of the California Vehicle Code, misdemeanors and crimes that bear a substantial relationship to the qualifications, functions or duties of a real estate licensee pursuant to Section 2910, Title 10, of the California Code of Regulations.

On February 25, 2019, a diligent search was made of the records of the Department relating to Respondent's real estate broker license No. 01809635. No record or written notice was received from Respondent notifying the Department, in writing, of any arrest, conviction, indictment or license disciplinary action.

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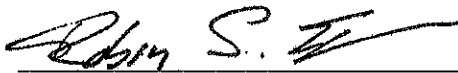


On or about January 8, 1998, in the Superior Court of the State of California, County of Humboldt, Case No. CR975019M, Respondent was convicted of violating Section 23103 (reckless driving) of the California Vehicle Code, a misdemeanor.

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.

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



ROBIN S. TANNER  
Supervising Special Investigator

Dated at Oakland, California,  
this 16<sup>th</sup> day of May, 2019.

DISCOVERY DEMAND

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 Administrative Hearings deems appropriate.

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