	Flag,		
1	KYLE T. JONES, Counsel (SBN 300751) Department of Real Estate		
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4	Telephone: (916) 576-8700 MAY 1 7 2019 (916) 263-3767 (Fax) DEPARTMENT OF REAL ESTATE		
5	(916) 576-7840 (Direct) By $Ghicuplas$		
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8	REFORE THE DEDADTMENT OF DEAL ESTATE		
9	BEFORE THE DEPARTMENT OF REAL ESTATE		
10	STATE OF CALIFORNIA		
11	* * * In the Matter of the Accusation of		
12) No. H-12376 SF		
13	STACY COOPER GALLUZI,)) <u>FIRST AMENDED</u>		
14	Respondent.		
15)		
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.		
23	2		
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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2	In response to Question 17 of said broker renewal application to wit: "ARE
3	THERE CRIMINAL CHARGES PENDING AGAINST YOU AT THIS TIME, OR ARE YOU
4	CURRENTLY AWAITING JUDGMENT AND SENTENCING FOLLOWING ENTRY OF A
5	PLEA OR JURY VERDICT? IF YES, COMPLETE ITEM 22," Respondent concealed and
6	failed to disclose the pending charges described below in paragraph 4.
7	4
8	On or about April 24, 2017, in the Superior Court of the State of California,
9	County of Sonoma, Case No. SCR-701827-1, Respondent was charged with violating Section
10	273a(a) (abusing or endangering health of a child) of the California Penal Code and Section
11	23153(a) (driving under the influence of alcohol-with injury) of the California Vehicle Code,
12	felonies. The charges against Respondent were disposed of on or about March 28, 2018.
13	5
14	On or about March 28, 2018, in the Superior Court of the State of California,
15	County of Sonoma, Case No. SCR-701827-1, Respondent was convicted of violating Section
16	273a(a) of the California Penal Code and Section 23153(a) of the California Vehicle Code,
17	misdemeanors and crimes that bear a substantial relationship to the qualifications, functions or
18	duties of a real estate licensee pursuant to Section 2910, Title 10, of the California Code of
19	Regulations.
20	6
21	On February 25, 2019, a diligent search was made of the records of the
22	Department relating to Respondent's real estate broker license No. 01809635. No record or
23	written notice was received from Respondent notifying the Department, in writing, of any arrest,
24	conviction, indictment or license disciplinary action.
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1	GROUNDS FOR DISCIPLINE
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3	The facts alleged in Paragraph 3, above, constitute cause under Section 10177(a)
4	(attempt to procure a license renewal by fraud, misrepresentation or deceit) of the Code for the
5	suspension or revocation of all licenses and license rights of Respondent under the Real Estate
6	Law.
7	8
8	The facts alleged in Paragraph 5, above, constitute cause under Sections 490
9	(conviction of substantially related crime) and 10177(b) (conviction of substantially related
10	crime) of the Code for the suspension or revocation of all licenses and license rights of
11	Respondent under the Real Estate Law.
12	9
13	Respondent's failure to report the conviction to the Department, as described in
14	Paragraph 6, above, violates Section 10186.2 (a) (conviction reporting requirements) of the
15	Code, and constitutes cause under Section 10177(d) (willful disregard or violation of Real Estate
16	Law) of the Code for suspension or revocation of all licenses and license rights of Respondent
17	under the Real Estate Law.
18	MATTER IN AGGRAVATION
19	10
20	On or about September 24, 2008, in the Superior Court of the State of California,
21	County of Sonoma, Case No. SCR-538946-1, Respondent was convicted of violating Section
22	23105.5 (reckless driving-with alcohol) of the California Vehicle Code, a misdemeanor.
23	11
24	On or about April 13, 2000, in the Superior Court of the State of California,
25	County of Humboldt, Case No. CR001134S, Respondent was convicted of violating Section
26	490.1 (petty theft) of the California Penal Code, a misdemeanor.
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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 13
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.
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ROBIN S. TANNER Supervising Special Investigator
Dated at Oakland, California,
this 16th day of May 2019.
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1	DISCOVERY DEMAND
2	Pursuant to Sections 11507.6, et seq. of the Administrative Procedure Act, the
3	Department hereby makes demand for discovery pursuant to the guidelines set forth in the
4	Administrative Procedure Act. Failure to provide Discovery to the Department may result in the
5	exclusion of witnesses and documents at the hearing or other sanctions that the Office of
6	Administrative Hearings deems appropriate.
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