1	KYLE T. JONES, Counsel (SBN 300751)
2	Bureau of Real Estate P.O. BOX 137007 FILED
3	Sacramento, CA 95813-7007
4	Telephone: (916) 263-8672 BUREAU OF REAL ESTATE
5	(916) 263-3767 (Fax) (916) 263-7303 (Direct) By B. N. OW (S)
6	
7	
8	BEFORE THE BUREAU OF REAL ESTATE
9	STATE OF CALIFORNIA
10	* * *
11	In the Matter of the Accusation of
12) No. H-12211 SF THOMAS ANDREW LEGAULT,)
13) <u>ACCUSATION</u> Respondent.)
14)
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 THOMAS
18	ANDREW LEGAULT ("Respondent"), is informed and alleges as follows:
19	Posmandantia una suda li di
20	Respondent is presently licensed and/or has license rights under the Real Estate
21	Law, Part 1 of Division 4 of the Business and Professions Code ("Code") as a real estate broker.
22	CRIMINAL CONVICTION
23	On or about September 20, 2017 in the United States Birding Control
24	On or about September 20, 2017, in the United States District Court, Northern
25	District of California, Case No. 4:11-cr-00429-PJH, Respondent was convicted of violating
26	Section 1 (bid rigging), Title 15, of the United States Code, a felony and a crime that bears a substantial relationship to the qualifications, functions or duties of a real estate licensee pursuant
27	to Section 2910, Title 10, of the California Code of Regulations.
	,, or was outlined code of Regulations.

GROUNDS FOR DISCIPLINE

The facts alleged in Paragraph 2, above, constitute cause under Sections 490 (conviction of substantially related crime), 10177(b) (conviction of substantially related crime), and 10177(j) (fraud or dishonest dealing) of the Code for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

COST RECOVERY

The Bureau will seek to recover cost 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 Bureau, 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 23 day of the 2018

DISCOVERY DEMAND

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