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FILED

AUG - 7 2015

BUREAU OF REAL ESTATE

By 

8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of) No. H-39934 LA
12)
13 GREGORY JAMES TOUSSIENG,) ACCUSATION
14)
15 Respondent.)

16 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
17 of California, for cause of Accusation against GREGORY JAMES TOUSSIENG, a.k.a. Greg
18 James Toussieng, (“Respondent”), alleges as follows:

19 1.

20 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
21 of California, makes this Accusation in her official capacity.

22 2.

23 Respondent presently has license rights under the Real Estate Law, Part 1 of
24 Division 4 of the California Business and Professions Code (“Code”), as a real estate broker.

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27 Accusation of Gregory James Toussieng

1 3.

2 On or about August 4, 2014, in the Superior Court of California, County of
3 Orange, Case No. 13HF3591, Respondent pled guilty to and was convicted for violation of
4 California Health & Safety Code Sections 11351 (possession of a controlled substance with an
5 intent to sell) and 11350 (possession of controlled substances), both felonies. Respondent was
6 placed on formal probation for 3 years and ordered to serve 90 days in jail. In addition,
7 Respondent was ordered to complete the Hoag Chemical Dependency Program. These
8 convictions bear a substantial relationship under Section 2910, Title 10, Chapter 6, California
9 Code of Regulations to the qualifications, functions or duties of a real estate licensee.

10 4.

11 The crimes of which Respondent was convicted, as described in Paragraph 3
12 above, constitute cause under Sections 490 and 10177(b) of the Code for the suspension or
13 revocation of the license and license rights of Respondent under the Real Estate Law.

14 5.

15 California Business and Professions Code Section 10106, provides, in pertinent
16 part, that in any order issued in resolution of a disciplinary proceeding before the Bureau of
17 Real Estate, the Commissioner may request the administrative law judge to direct a licensee
18 found to have committed a violation of this part to pay a sum not to exceed the reasonable costs
19 of the investigation and enforcement of the case.

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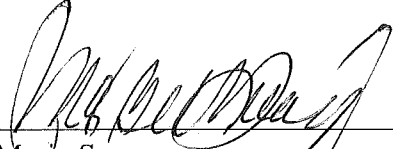
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Accusation of Gregory James Toussieng

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

8 this 22nd day of July, 2015
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11 _____
12 Maria Suarez
13 Supervising Special Investigator

14 cc: GREGORY JAMES TOUSSIENG
15 Maria Suarez
16 Sacto.
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Accusation of Gregory James Toussieng