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FILED

FEB 23 2016
BUREAU OF REAL ESTATE
By John Cruiser

BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of CARTHEL JAMES TOWNS, SR, Respondent.	No. H-40146 LA ACCUSATION

The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California, for cause of Accusation against CARTHEL JAMES TOWNS, SR, a.k.a. Carthel Towns, Sr., Carthel James Towns, or Carthel J. Pigee ("Respondent"), alleges as follows:

1.

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

2.

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

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(CRIMINAL CONVICTION)

3.

On or about March 21, 2013, in the Superior Court of California, County of Los Angeles, Case No. PA065739, Respondent was convicted for violation of California Penal Code Section 487(a) (grand theft of personal property), a misdemeanor. This conviction bears a substantial relationship under Section 2910, Title l0, Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real estate licensee.

4.

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

(FAILURE TO REVEAL)

5.

On or about October 27, 2013, Respondent filed a Broker Renewal Application. In response to Question 4 of his application, to wit, "WITHIN THE SIX-YEAR PERIOD PRIOR TO FILING THIS APPLICATION, HAVE YOU BEEN CONVICTED OF A MISDEMEANOR OR FELONY?" Respondent answered "NO" and failed to reveal the conviction, as described in Paragraph 3 above.

6.

Respondent's failure to reveal this conviction, as set forth in Paragraph 3 above, in his Broker Renewal Application constitutes an attempt to procure a license renewal by fraud, misrepresentation, or deceit, or by making a false statement of material fact required to be revealed in said application, which is grounds for suspending or revoking a license under California Business and Professions Code sections 498 and 10177(a).

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(INVESTIGATION AND ENFORCEMENT COSTS)

7.

California Business and Professions Code Section 10106, provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Bureau of Real Estate, 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 the licenses and license rights of Respondent CARTHEL JAMES TOWNS, SR 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 applicable provisions of law.

Dated at Los Angeles, California
this 22nd day of February, 2016

Maria Suarez
Supervising Special Investigator

cc: CARTHEL JAMES TOWNS, SR
Maria Suarez
Sacto.