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FILED

FEB 23 2016

BUREAU OF REAL ESTATE

By John C. Gail

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8
9 BEFORE THE BUREAU OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-40146 LA
13)
14 CARTHEL JAMES TOWNS, SR,) ACCUSATION
15)
16 Respondent.)
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27)

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

20 1.

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

23 2.

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

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ACCUSATION

1 (CRIMINAL CONVICTION)

2 3.

3 On or about March 21, 2013, in the Superior Court of California, County of Los
4 Angeles, Case No. PA065739, Respondent was convicted for violation of California Penal
5 Code Section 487(a) (grand theft of personal property), a misdemeanor. This conviction bears a
6 substantial relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations
7 to the qualifications, functions or duties of a real estate licensee.

8 4.

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

12 (FAILURE TO REVEAL)

13 5.

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

19 6.

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

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26 ///

27 ACCUSATION

(INVESTIGATION AND ENFORCEMENT COSTS)

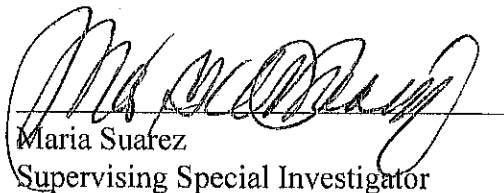
7.

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 CARTEL 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 20th day of February, 2016


Maria Suarez
Supervising Special Investigator

cc: CARTEL JAMES TOWNS, SR
Maria Suarez
Sacto.

ACCUSATION