

Kevin H. Sun, Counsel (SBN 276539)
Department of Real Estate
320 West 4th Street, Suite 350
Los Angeles, California 90013-1105
Telephone: (213) 576-6982
Fax: (213) 576-6917
Email: Kevin.Sun@dre.ca.gov
Attorney for Complainant

FILED

NOV 12 2024

DEPT. OF REAL ESTATE

By—

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)	No. H-43019 LA
)	
GREGORY GLEN WOLD,)	<u>ACCUSATION</u>
)	
Respondent.)	
)	

The Complainant, Jason Parson, a Supervising Special Investigator of the State of California, for cause of Accusation against GREGORY GLEN WOLD ("Respondent") alleges as follows:

1.

The Complainant, Jason Parson, a Supervising Special Investigator of the State of California, makes this Accusation in his official capacity.

2.

All references to the "Code" are to the California Business and Professions Code and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

LICENSE HISTORY

3.

a. At all times herein mentioned, Respondent was and still is licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and

ACCUSATION

1 Professions Code, as a real estate salesperson ("RES"), Department of Real Estate¹
2 ("Department") license ID 01710171.

3 b. The Department originally issued Respondent's RES license on or about
4 November 5, 2005.

5 c. Respondent's RES license will expire on October 9, 2027, unless renewed.

6 CAUSE FOR DISCIPLINE
7 (CRIMINAL CONVICTION)

8 4.

9 December 8, 2021; Health and Safety Code ("HSC") Section 11378 - Felony

10 a. On or about August 16, 2021, in the Superior Court of California, Ventura
11 County, in Case No. **2021021212**, entitled The People of the State of California v. Gregory
12 Glen Wold, a felony complaint was brought against Respondent for violation of (1) HSC
13 Section 11351 (possession of a controlled substance, to wit, heroin), a felony, (2) HSC Section
14 11378 (possession of a controlled substance, to wit, methamphetamine), a felony, and (3) Penal
15 Code Section 466 (possession of burglar's tools), a misdemeanor.

16 b. On or about December 8, 2021, Respondent pled guilty to and was convicted
17 for violation of HSC Section 11378 (possession of a controlled substance, to wit,
18 methamphetamine), a felony.

19 c. On or about January 7, 2022, the Court suspended the imposition of sentence
20 and placed Respondent on formal probation for 24 months under certain terms and conditions,
21 including, in part, 180 days jail, participate in Drug Court Program, driver's license revocation,
22 and payment of fines and fees.

23 5.

24 The crime of which Respondent was convicted, in Paragraph 4, by its facts and
25 circumstances, bears a substantial relationship under Section 2910, Title 10, Chapter 6,
26

27 ¹ Between July 1, 2013 and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate
under the Department of Consumer Affairs.

1 California Code of Regulations to the qualifications, functions or duties of a real estate licensee
2 and constitutes cause under **Code Sections 490 and 10177(b)** for the suspension or revocation
3 of the license and license rights of Respondent under the Real Estate Law.

4 **SECOND CAUSE FOR DISCIPLINE**

5 **(FAILURE TO REPORT)**

6 6.

7 Respondent did not report in writing to the Department of a felony complaint
8 being brought against him within thirty (30) days (August 16, 2021).

9 7.

10 Respondent did not report in writing to the Department of his conviction within
11 thirty (30) days of the conviction date (December 8, 2021).

12 8.

13 Respondent's failure to report the felony complaint against him and his
14 conviction constitutes causes for discipline under **Code Section 10186.2²** of the license and
15 license rights of Respondent under the Real Estate Law.

16 9.

17 These proceedings are brought under the provisions of Section 10100, Division
18 4 of the Business and Professions Code of the State of California and Sections 11500 through
19 11528 of the California Government Code.

20 **COSTS**

21 10.

22 **Code Section 10106** provides, in pertinent part, that in any order issued in
23 resolution of a disciplinary proceeding before the Department, the Commissioner may request
24

25 ² Pursuant to Business and Professions Code 10186.2: (a)(1) A licensee shall report any of the following to the
26 department: (A) The bringing of an indictment or information charging a felony against the licensee. (B) The
27 conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any felony or
misdemeanor. (c) Any disciplinary action taken by another licensing entity or authority of this state or of another
state or an agency of the federal government. (2) The report required by this subdivision shall be made in writing
within 30 days of the date of the bringing of the indictment or the charging of a felony, the conviction, or the
disciplinary action. (b) Failure to make a report required by this section shall constitute a cause for discipline.

1 the administrative law judge to direct a licensee found to have committed a violation of this
2 part to pay a sum not to exceed the reasonable costs of investigation and enforcement of the
3 case.

4 PRAYER

5 WHEREFORE, Complainant prays that a hearing be conducted on the
6 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
7 disciplinary action against all licenses and/or license rights under the Real Estate Law (Part 1 of
8 Division 4 of the California Business and Professions Code) of Respondent GREGORY GLEN
9 WOLD, for the cost of investigation and enforcement as permitted by law, and for such other
10 and further relief as may be proper under applicable provisions of law.

11
12 Dated at Los Angeles, California this 12th day of November, 2024.

13
14
15 Supervising Special Investigator

16 cc: GREGORY GLEN WOLD
17 Jason Parson
18 Sacto.
19
20
21
22
23
24
25
26
27