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**FILED**

JUL 18 2014

BUREAU OF REAL ESTATE

By *S. Black*

Bureau of Real Estate  
P.O. Box 187007  
Sacramento, CA 95818-7007

Telephone: (916) 227-0781

BEFORE THE BUREAU OF REAL ESTATE  
STATE OF CALIFORNIA

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In the Matter of the Accusation of

PRIORITY 1<sup>ST</sup> REALTY INC.,  
JEFFERY SCOTT HARRIS, and  
RENE A. DELGADO,

Respondents.

No. H-6012 SAC

STIPULATION AND  
AGREEMENT

It is hereby stipulated by and between PRIORITY 1<sup>ST</sup> REALTY INC. and JEFFERY SCOTT HARRIS (Respondents), and the Complainant, acting by and through Truly Sughrue, Counsel for the Bureau of Real Estate (Bureau), as follows for the purpose of settling and disposing the Accusation (Accusation) filed on August 28, 2013 in this matter:

1. All issues which were to be contested and all evidence which was to be presented by Complainant and Respondents at a formal hearing on the Accusation, which hearing was to be held in accordance with the provisions of the Administrative Procedure Act (APA), shall instead and in place thereof be submitted solely on the basis of the provisions of this Stipulation and Agreement.

2. Respondents have received, read, and understand the Statement to Respondent, and the Discovery Provisions of the APA filed by the Bureau in this proceeding.

1                   3.       Respondents filed a Notice of Defense pursuant to Section 11505 of the  
2 Government Code for the purpose of requesting a hearing on the allegations in the Accusation.  
3 Respondents hereby freely and voluntarily withdraw said Notice of Defense. Respondents  
4 acknowledge that they understand that by withdrawing said Notice of Defense they will thereby  
5 waive their rights to require the Real Estate Commissioner (Commissioner) to prove the  
6 allegations in the Accusation at a contested hearing held in accordance with the provisions of the  
7 APA, and that they will waive other rights afforded to them in connection with the hearing such  
8 as the right to present evidence in defense of the allegations in the Accusation and the right to  
9 cross-examine witnesses.

10                   4.       This stipulation is based on the factual allegations contained in the  
11 Accusation. In the interest of expediency and economy, Respondents choose not to contest these  
12 factual allegations, but to remain silent and understands that, as a result thereof, these factual  
13 statements will serve as a prima facie basis for the "Determination of Issues" and "Order" set  
14 forth below. The Commissioner shall not be required to provide further evidence to prove such  
15 allegations.

16                   5.       This Stipulation and Respondents' decision not to contest the Accusation  
17 are made for the purpose of reaching an agreed disposition of this proceeding and are expressly  
18 limited to this proceeding and any other proceeding or case in which the Bureau, the state or  
19 federal government, an agency of this state, or an agency of another state is involved.

20                   6.       It is understood by the parties that the Commissioner may adopt the  
21 Stipulation and Agreement as his decision in this matter thereby imposing the penalty and  
22 sanctions on the real estate licenses and license rights of Respondents as set forth in the below  
23 "Order". In the event that the Commissioner in his discretion does not adopt the Stipulation and  
24 Agreement, it shall be void and of no effect, and Respondents shall retain the right to a hearing  
25 and proceeding on the Accusations under all the provisions of the APA and shall not be bound by  
26 any admission or waiver made herein.

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a) PRIORITY shall obey all laws, rules and regulations governing the rights, duties and responsibilities of a real estate licensee in the State of California; and,

b) That no final subsequent determination be made, after hearing or upon stipulation, that cause for disciplinary action occurred within two (2) years from the effective date of this Order. Should such a determination be made, the Commissioner may, in his discretion, vacate and set aside the stay order and reimpose all or a portion of the stayed suspension. Should no such determination be made, the stay imposed herein shall become permanent.

II

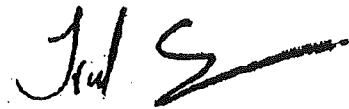
All licenses and licensing rights of Respondent HARRIS under the Real Estate Law are suspended for a period of fifteen (15) days from the effective date of this Order; provided, however, that:

1) Fifteen (15) days of said suspension shall be stayed for two (2) years upon the following terms and conditions:

a) HARRIS shall obey all laws, rules and regulations governing the rights, duties and responsibilities of a real estate licensee in the State of California; and,

b) That no final subsequent determination be made, after hearing or upon stipulation, that cause for disciplinary action occurred within two (2) years from the effective date of this Order. Should such a determination be made, the Commissioner may, in his discretion, vacate and set aside the stay order and reimpose all or a portion of the stayed suspension. Should no such determination be made, the stay imposed herein shall become permanent.

JUN 11 2014



DATED

TRULY SUGHRUE  
Counsel for Complainant

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1 I have read the Stipulation and Agreement, and its terms are understood by me  
 2 and are agreeable and acceptable to me. I understand that I am waiving rights given to me by the  
 3 California Administrative Procedure Act, and I willingly, intelligently and voluntarily waive  
 4 those rights, including the right of requiring the Commissioner to prove the allegations in the  
 5 Accusations at a hearing at which I would have the right to cross-examine witnesses against me  
 6 and to present evidence in defense and mitigation of the charges.

7  
 8 6/4/14  
 9 DATED

*Jeffery Scott Harris*  
 Jeffery Scott Harris, on behalf of  
 PRIORITY 1<sup>ST</sup> REALTY INC.  
 Respondent

11 6/4/14  
 12 DATED

*Jeffery Scott Harris*  
 JEFFERY SCOTT HARRIS  
 Respondent

14 \* \* \*

15 The foregoing Stipulation and Agreement is hereby adopted as my Decision and  
 16 shall become effective at 12 o'clock noon on AUG 06 2014

17 IT IS SO ORDERED JUL 10 2014

18  
 19 Real Estate Commissioner  
 20 *[Signature]*  
 21  
 22 By: JEFFREY MASON  
 23 Chief Deputy Commissioner