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| $\int \int $ | DIANE LEE, Counsel (SBN 247222) |
| Jet 2 | Department of Real Estate JUN 15 2012 320 West 4th Street, Suite 350 |
| 3 | Los Angeles, California 90013 DEPARTMENT OF REALESTATE |
| 4 | Telephone: (213) 576-6982 (Direct) (213) 576-6907 |
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| 8 | BEFORE THE DEPARTMENT OF REAL ESTATE |
| 9 | STATE OF CALIFORNIA |
| 10 | * * * |
| 11 | In the Matter of the Accusation of) No. H- 38200 LA |
| 12 | STEFANO JOSEPH MARRERO,) $A \subseteq C \sqcup S A \mp I O N$ |
| 13 | Respondent.) |
| 14 |) |
| 15 | The Complainant, Robin Trujillo, a Deputy Real Estate |
| 16 | Commissioner of the State of California for cause of Accusation |
| 17 | against STEFANO JOSEPH MARRERO ("Respondent") alleges as |
| 18 | follows: |
| 19 | 1. |
| 20 | The Complainant, Robin Trujillo, a Deputy Real Estate |
| 21 | Commissioner of the State of California, makes this Accusation |
| 22 | in her official capacity. |
| 23 | 2. |
| 24 | Respondent is presently licensed and/or has license |
| 25 | rights under the Real Estate Law, Part 1 of Division 4 of the |
| 26 | California Business and Professions Code, as a real estate |
| 27 | salesperson. Respondent's salesperson license expired on |
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| 1 | February 1, 2011. The Department of Real Estate retains |
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| 2 | jurisdiction over the suspended license pursuant to California |
| 3 | Business and Professions Code Section 10103. |
| 4 | |
| 5 | (CRIMINAL CONVICTION) |
| 6 | 3. |
| 7 | On or about September 30, 2011, in the Superior Court |
| 8 | of California, County of Orange, in case no. 10CF0125 F A, |
| 9 | Respondent was convicted of violating California Penal Code |
| 10 | Section 182(a)(1) (conspiracy to commit a crime), a misdemeanor. |
| 11 | This crime is substantially related to the qualifications, |
| 12 | functions, or duties of a real estate licensee under Section |
| 13 | 2910, Title 10, Chapter 6, California Code of Regulations. |
| 14 | 4. |
| 15 | . The crimes of which Respondent was convicted as |
| <u>1</u> 6 | described above constitute cause under California Business and |
| 17 | Professions Code Sections 490 and 10177(b) for the suspension or |
| 18 | revocation of the license and license rights of Respondent under |
| 19 | the Real Estate Law. |
| 20 | California Business and Professions Code Section 10106 |
| 21 | provides, in pertinent part, that in any order issued in |
| 22 | resolution of a disciplinary proceeding before the department, |
| 23 | the Commissioner may request the administrative law judge to |
| 24 | direct a licensee found to have committed a violation of this |
| 25 | part to pay a sum not to exceed the reasonable costs of |
| 26 | investigation and enforcement of the case. |
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| 1 | WHEREFORE, Complainant prays that a hearing be |
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| 2 | conducted on the allegations of this Accusation and that upon |
| 3 | proof thereof, a decision be rendered imposing disciplinary |
| 4 | action against all licenses and/or license rights under the Real |
| 5 | Estate Law (Part 1 of Division 4 of the California Business and |
| 6 | Professions Code) of Respondent STEFANO JOSEPH MARRERO for the |
| 7 | cost of investigation and enforcement as permitted by law, and |
| . 8 | for such other and further relief as may be proper under |
| 9 | applicable provisions of law. |
| 10 | Dated at Los Angeles, California: June 15, 2012. |
| 11 | |
| 12 | $\left(2 \right) $ |
| 13 | La rufillo |
| 14 | Robin Trujillo Deputy Real Estate commissioner |
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| 25 | CC: STEFANO JOSEPH MARRERO |
| 26 | Robin Trujillo Sacto. |
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