

FILED

APR - 6 2021

DEPT. OF REAL ESTATE

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1 Department of Real Estate
2 320 W. 4th Street, Suite 350
3 Los Angeles, CA 90013-1105
4 Telephone: (213) 576-6982

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8 **BEFORE THE DEPARTMENT OF REAL ESTATE**
9 **STATE OF CALIFORNIA**

10 * * *

11 In the Matter of the Accusation Against
12 DANIELLE TONI DEEB,
13 Respondent.

) DRE No. H-41851 LA

) STIPULATION AND AGREEMENT
) IN SETTLEMENT AND ORDER

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16 It is hereby stipulated by and between Respondent DANIELLE TONI DEEB
17 (sometimes referred to as "Respondent") and the Complainant, acting by and through Judith B.
18 Vasan, Counsel for the Department of Real Estate, as follows for the purpose of settling and
19 disposing of the Accusation ("Accusation") filed on December 9, 2020, in this matter:

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

25 2. Respondent has received, read and understands the Statement to Respondent,
26 the Discovery Provisions of the APA and the Accusation filed by the Department of Real Estate
27 ("Department") in this proceeding.

STIPULATION AND AGREEMENT IN SETTLEMENT AND ORDER

1 3. Respondent filed a Notice of Defense pursuant to Section 11506 of the
2 Government Code for the purpose of requesting a hearing on the allegations in the Accusation.
3 Respondent hereby freely and voluntarily withdraws said Notice of Defense. Respondent
4 acknowledges that Respondent understands that by withdrawing said Notice of Defense
5 Respondent thereby waives Respondent's right to require the 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 Respondent will waive other rights afforded to Respondent in connection with the
8 hearing such as the right to present evidence in his defense, and the right to cross-examine
9 witnesses.

10 4. Respondent, pursuant to the limitation set forth below, hereby admits that the
11 factual allegations as set forth in the Accusation filed in this proceeding are true and correct and
12 the Real Estate Commissioner shall not be required to provide further evidence of such
13 allegations.

14 5. It is understood by the parties that the Real Estate Commissioner may adopt
15 this Stipulation as his Decision in this matter thereby imposing the penalty and sanctions on
16 Respondent's real estate license and license rights as set forth in the below "Order." In the event
17 that the Commissioner in his discretion does not adopt the Stipulation, the Stipulation shall be
18 void and of no effect and Respondent shall file a Notice of Defense for a hearing and proceed on
19 the Accusation under the provisions of the APA and shall not be bound by any stipulation or
20 waiver made herein.

21 6. The Order or any subsequent Order of the Real Estate Commissioner made
22 pursuant to this Stipulation shall not constitute an estoppel, merger or bar to any further
23 administrative or civil proceedings by the Department with respect to any matters which were
24 not specifically alleged to be causes for accusation in this proceeding.

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1 Law, Regulations of the Real Estate Commissioner or conditions attaching to the restricted
2 license.

3 3. Respondent shall not be eligible to petition for the issuance of any unrestricted
4 real estate license nor for removal of any of the conditions, limitations or restrictions of a
5 restricted license until two (2) years have elapsed from the effective date of this Decision and
6 Order. Respondent shall not be eligible to apply for any unrestricted licenses until all restrictions
7 attaching to the license have been removed

8 4. Respondent shall submit with any application for license under an employing
9 broker, or any application for transfer to a new employing broker, a statement signed by the
10 prospective employing real estate broker on a form approved by the Department which shall
11 certify:

12 (a) That the employing broker has read the Decision of the Commissioner which
13 granted the right to a restricted license; and

14 (b) That the employing broker will exercise close supervision over the
15 performance by the restricted licensee relating to activities for which a real estate license is
16 required.

17 II.

18 Respondent shall notify the Commissioner in writing within seventy-two (72)
19 hours of any arrest by sending a certified letter to the Commissioner at the Department of Real
20 Estate, P.O. Box 137013, Sacramento, CA 95813-7013. The letter shall set forth the date of
21 Respondent's arrest, the crime for which Respondent was arrested and the name and address of
22 the arresting law enforcement agency. Respondent's failure to timely file written notice shall
23 constitute an independent violation of the terms of the restricted license and shall be grounds for
24 the suspension and revocation of that license.

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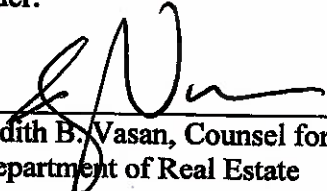
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1 III.

2 All licenses and licensing rights of Respondent are indefinitely suspended unless
3 or until Respondent pays the sum of \$1,501.80 for the Commissioner's reasonable costs of the
4 investigation (\$1,348.20) and enforcement (\$153.60), which led to this disciplinary action. Said
5 payment shall be in the form of a cashier's check made payable to the Department of Real
6 Estate. The investigative and enforcement costs must be delivered to the Department of Real
7 Estate, Flag Section, at P.O. Box 137013, Sacramento, CA 95813-7013, within sixty (60) days
8 from the effective date of this Decision and Order.

9
10 DATED: 5-3-2021

11 
12 Judith B. Vasan, Counsel for
13 Department of Real Estate

14 * * *

15 EXECUTION OF THE STIPULATION

16 I have read the Stipulation and its terms are understood by me and are agreeable
17 and acceptable to me. I understand that I am waiving rights given to me by the California
18 Administrative Procedure Act (including but not limited to Sections 11506, 11508, 11509 and
19 11513 of the Government Code), and I willingly, intelligently and voluntarily waive those rights,
20 including the right of requiring the Commissioner to prove the allegations in the Accusation at a
21 hearing at which I would have the right to cross-examine witnesses against me and to present
22 evidence in defense and mitigation of the charges.

23 Respondent shall mail the original signed signature page of the stipulation herein
24 to Judith B. Vasan, Attention: Legal Section, Department of Real Estate, 320 W. Fourth St.,
25 Suite 350, Los Angeles, California 90013-1105.

26 In the event of time constraints before an administrative hearing, Respondent can
27 signify acceptance and approval of the terms and conditions of this Stipulation and Agreement
by emailing a scanned copy of the signature page, as actually signed by Respondent, to the
Department counsel assigned to this case. Respondent agrees, acknowledges, and understands

1 that by electronically sending the Department a scan of Respondent's actual signature as it
2 appears on the Stipulation and Agreement that receipt of the scan by the Department shall be
3 binding on Respondent as if the Department had received the original signed Stipulation and
4 Agreement.

5 Respondent's signature below constitutes acceptance and approval of the terms
6 and conditions of this Stipulation. Respondent agrees, acknowledges and understands that by
7 signing this Stipulation, Respondent is bound by its terms as of the date of such signatures and
8 that this agreement is not subject to rescission or amendment at a later date except by a separate
9 Decision and Order of the Real Estate Commissioner.

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11 DATED: March 1, 2021



12 DANIELLE TONI DEEB
13 Respondent

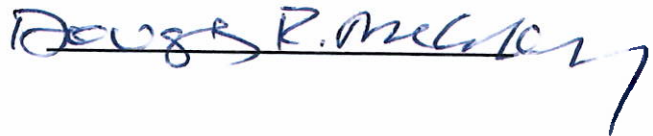
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16 The foregoing Stipulation and Agreement is hereby adopted as my Decision as to
17 Respondent DANIELLE TONI DEEB and shall become effective at 12 o'clock noon on

18 APR 26 2021

19 IT IS SO ORDERED 3.23.21

20
21 DOUGLAS R. McCAULEY
22 REAL ESTATE COMMISSIONER

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26
27 STIPULATION AND AGREEMENT IN SETTLEMENT AND ORDER