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DEPT. OF REAL ESTATE
By *[Signature]*

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10 **BEFORE THE DEPARTMENT OF REAL ESTATE**
11 **STATE OF CALIFORNIA**

12 * * *

13 In the Matter of the Accusation of) No. H- 41909 LA
14 ALAN ROGERS STONEMAN and))
15 ALICIA MAI ROCCISANO,) ACCUSATION
16 Respondents.))
17)

18 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
19 State of California, for cause of Accusation against ALAN ROGERS STONEMAN and
20 ALICIA MAI ROCCISANO ("Respondents"), is informed and alleges as follows:

21 1.

22 The Complainant, Veronica Kilpatrick, acting in her official capacity as a
23 Supervising Special Investigator of the State of California, makes this Accusation against
24 Respondents ALAN ROGERS STONEMAN and ALICIA MAI ROCCISANO.

25 2.

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

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1 LICENSE HISTORY

2 3.

3 Respondent ALAN ROGERS STONEMAN ("STONEMAN") presently has
4 license rights under the Real Estate Law, Part 1 of Division 4 of the Code as a restricted real
5 estate broker.

6 4.

7 Respondent ALICIA MAI ROCCISANO ("ROCCISANO") presently has
8 license rights as a real estate salesperson.

9 5.

10 On or about September 30, 1991, the Real Estate Commissioner in Case
11 No. H-721 SA adopted as his Decision effective October 24, 1991, a Stipulation and Agreement
12 revoking Respondent STONEMAN'S real estate license but granting STONEMAN the right to
13 a restricted real estate broker license on terms and conditions. STONEMAN stipulated that
14 cause existed for the suspension or revocation of STONEMAN'S real estate license on the
15 grounds of a conviction for violation of Title 18, United States Code section 371 (Conspiracy to
16 Commit Mail Fraud and Interstate Transportation in Aid of Racketeering), a felony, and on the
17 grounds of disbarment from the practice of law by the California Supreme Court.

18 BROKERAGE

19 ALAN ROGERS STONEMAN

20 6.

21 At all times mentioned, in the City of Cathedral City, County of Riverside,
22 Respondent STONEMAN acted as a real estate broker, conducting licensed activities within the
23 meaning of Code sections 10131(a) (sells or buys real property for others) and 10131(b) (leases
24 or rents real property for others).

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1 INVESTIGATION

2 ALAN ROGERS STONEMAN

3 7.

4 The Department investigated Respondents STONEMAN and ROCCISANO
5 pertaining to the activities described in Paragraph 6 which require a real estate license.

6 8.

7 Respondents STONEMAN and ROCCISANO accepted or received funds in
8 trust ("trust funds"). Thereafter, Respondent made deposits and or disbursements of such trust
9 funds.

10 VIOLATIONS OF THE REAL ESTATE LAW

11 9.

12 In the course of activities described in Paragraph 6 above, Respondents
13 STONEMAN and ROCCISANO acted in violation of the Code and the Regulations in that:

14 9(a) A bank account used by Respondents STONEMAN for trust funds was
15 not designated as a trust account, and was not in the name of Respondent as trustee or a
16 fictitious name held by Respondent's real estate license as trustee, in violation of Code
17 section 10145 and Regulations section 2832.

18 9(b) Respondents STONEMAN and ROCCISANO used the unlicensed
19 fictitious business names "Desert Cities RV Properties", and "Desert Cities", in violation of
20 Code section 10159.5 and Regulations section 2731.

21 9(c) The conduct, acts, or omissions of Respondent STONEMAN, as
22 described in Paragraph 9, in failing to ensure compliance of the Real Estate Law by Respondent
23 STONEMAN'S officers, agents and employees, including Respondent ROCCISANO, is in
24 violation of Code section 10159.2 and Regulations section 2725.

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10.

The conduct, acts, or omissions of Respondents STONEMAN and ROCCISANO, described in Paragraph 9 above, violated the Code and the Regulations as set forth below:

<u>PARAGRAPH</u>	<u>PROVISIONS VIOLATED</u>
9(a)	Code section 10145 and Regulations section 2832 (STONEMAN)
9(b)	Code section 10159.5 and Regulations section 2731 (STONEMAN and ROCCISANO)
9(c)	Code section 10159.2 and Regulations section 2725 (STONEMAN)

The foregoing violations constitute cause for the suspension or revocation of all the licenses, license endorsements, and license rights of Respondent STONEMAN under the Real Estate Law pursuant to the provisions of Code sections 10177(d), 10177(g), and 10177(h)

The foregoing violations constitute cause for the suspension or revocation of all the licenses, license endorsements, and license rights of Respondent ROCCISANO under the Real Estate Law pursuant to the provisions of Code sections 10177(d) and 10177(g).

11.


Code Section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department 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.

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1 WHEREFORE, Complainant prays that a hearing be conducted on the
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3 disciplinary action against all the licenses, license endorsements, and license rights of
4 Respondents ALAN ROGERS STONEMAN and ALICIA MAI ROCCISANO under the Real
5 Estate Law, for the cost of investigation and enforcement as permitted by law, and for such
6 other and further relief as may be proper under other applicable provisions of law.

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8 Dated at San Diego, California

9 this 18th day of March, 2021

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11 
12 Veronica Kilpatrick
13 Supervising Special Investigator

14 cc: ALAN ROGERS STONEMAN
15 ALICIA MAI ROCCISANO
16 Veronica Kilpatrick
17 Sacto.