

1 Department of Real Estate  
1651 Exposition Blvd, P.O. Box 137007  
2 Sacramento, CA 95813-7007

3 Telephone: (916) 576-8700

**FILED**

JAN 04 2021

DEPARTMENT OF REAL ESTATE  
By B. Nicholas

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

10 \* \* \*

11 In the Matter of the Application of )

DRE No. H-3324 FR

12 VERONICA LAINE WILLIAMS- )  
13 BRANCH, )

**STIPULATION AND WAIVER**

14 Respondent. )

15 It is hereby stipulated by and between VERONICA LAINE WILLIAMS-BRANCH  
16 (“Respondent”) and Respondent’s attorney, ED GONZALEZ , and the Complainant, acting by and  
17 through Truly A. Sughrue , Counsel for the Department of Real Estate (“Department”), as follows  
18 for the purpose of settling and disposing of the Statement of Issues filed on June 03, 2020 in this  
19 matter:

20 Respondent acknowledges that Respondent has received and read the Statement of Issues and  
21 the Statement to Respondent filed by the Department in connection with Respondent’s application  
22 for a real estate salesperson license. Respondent understands that the Real Estate Commissioner  
23 (“Commissioner”) may hold a hearing on this Statement of Issues for the purpose of requiring  
24 further proof of Respondent’s honesty and truthfulness and to prove other allegations therein, or  
25 that he may in his discretion waive the hearing and grant Respondent a restricted real estate  
26 salesperson license based upon this Stipulation and Waiver. Respondent also understands that by  
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1 filing the Statement of Issues in this matter the Commissioner is shifting the burden to Respondent  
2 to make a satisfactory showing that Respondent meets all the requirements for issuance of a real  
3 estate salesperson license. Respondent further understands that by entering into this Stipulation and  
4 Waiver, Respondent will be stipulating that the Commissioner has found that Respondent has failed  
5 to make such a showing, thereby justifying the denial of the issuance to Respondent of an  
6 unrestricted real estate salesperson license.

7 Respondent hereby admits that the allegations of the Statement of Issues filed against  
8 Respondent are true and correct and requests that the Commissioner in his discretion issue a  
9 restricted real estate salesperson license to Respondent under the authority of Section 10156.5 of  
10 the Business and Professions Code ("the Code").

11 Respondent is aware that by signing this Stipulation and Waiver, Respondent is waiving  
12 Respondent's right to a hearing and the opportunity to present evidence at the hearing to establish  
13 Respondent's rehabilitation in order to obtain an unrestricted real estate salesperson license if this  
14 Stipulation and Waiver is accepted by the Commissioner. However, Respondent is not waiving  
15 Respondent's right to a hearing and to further proceedings to obtain a restricted or unrestricted  
16 license if this Stipulation and Waiver is not accepted by the Commissioner.

17 Respondent agrees that by signing this Stipulation and Waiver, the conditions, limitations, and  
18 restrictions imposed on Respondent's restricted license, identified below, may be removed only by  
19 filing a Petition for Removal of Restrictions ("Petition") with the Commissioner, and that  
20 Respondent's Petition must follow the procedures set forth in Government Code Section 11522.

21 Respondent further understands that the restricted license issued to Respondent shall be  
22 subject to all of the provisions of Section 10156.7 of the Code and to the following limitations,  
23 conditions and restrictions imposed under authority of Section 10156.6 of the Code:

- 24 1. The restricted license shall not confer any property right in the privileges to be exercised  
25 including the right of renewal, and the Commissioner may by appropriate order suspend  
26 the right to exercise any privileges granted under the restricted license in the event of:  
27

- 1 a. Respondent's conviction (including a plea of nolo contendere) of a crime which bears  
2 a substantial relationship to Respondent's fitness or capacity as a real estate licensee;  
3 or  
4 b. The receipt of evidence that Respondent has violated provisions of the California Real  
5 Estate Law, the Subdivided Lands Law, Regulations of the Commissioner, or  
6 conditions attaching to the restricted license.
- 7 2. Respondent shall not be eligible to petition for the issuance of an unrestricted real estate  
8 license nor the removal of any of the conditions, limitations, or restrictions attaching to the  
9 restricted license until three years have elapsed from the date of issuance of the restricted  
10 license to Respondent. Respondent shall not be eligible to apply for any unrestricted  
11 licenses until all restrictions attaching to the license have been removed.
- 12 3. With the application for license, or with the application for transfer to a new employing  
13 broker, Respondent shall submit a statement signed by the prospective employing broker  
14 on a form approved by the Department wherein the employing broker shall certify as  
15 follows:  
16 a. That the broker has read the Statement of Issues which is the basis for the issuance of  
17 the restricted license; and  
18 b. That the broker will carefully review all transaction documents prepared by the  
19 restricted licensee and otherwise exercise close supervision over the licensee's  
20 performance of acts for which a license is required.
- 21 4. Respondent shall notify the Commissioner in writing within 72 hours of any arrest by  
22 sending a certified letter to the Commissioner at the Department of Real Estate, Post Office  
23 Box 137013, Sacramento, CA 95813-7013. The letter shall set forth the date of  
24 Respondent's arrest, the crime for which Respondent was arrested and the name and address  
25 of the arresting law enforcement agency. Respondent's failure to timely file written notice  
26 shall constitute an independent violation of the terms of the restricted license and shall be  
27 grounds for the suspension or revocation of that license.

1                    6 November 2020

2                    Dated



3                    Truly A. Sughrue , Counsel, Department of Real  
4                    Estate

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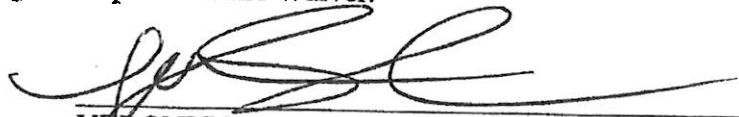
6                    Respondent has read this Stipulation and Waiver, has discussed it with Respondent's counsel,  
7                    and its terms are understood by Respondent and are agreeable and acceptable to Respondent.  
8                    Respondent understands that Respondent is waiving rights given to Respondent by the California  
9                    Administrative Procedure Act (including but not limited to Sections 11506, 11508, 11509, and  
10                    11513 of the Government Code), and Respondent willingly, intelligently, and voluntarily waives  
11                    those rights, including the right of a hearing on the Statement of Issues at which Respondent would  
12                    have the right to cross-examine witnesses against Respondent and to present evidence in defense  
13                    and mitigation of the charges.

14                    Respondent shall send a hard copy of the original signed Stipulation and Waiver to: Truly A.  
15                    Sughrue , Department of Real Estate, 1651 Exposition, Blvd., Sacramento, CA, 95813.

16                    In the event of time constraints before an administrative hearing, Respondent can signify  
17                    acceptance and approval of the terms and conditions of this Stipulation and Waiver by emailing a  
18                    scanned copy of the signature page, as actually signed by Respondent, to the Department counsel  
19                    assigned to this case. Respondent agrees, acknowledges and understands that by electronically  
20                    sending the Department a scan of Respondent's actual signature as it appears on the Stipulation and  
21                    Waiver, that receipt of the scan by the Department shall be binding on Respondent as if the  
22                    Department had received the original signed Stipulation and Waiver.

23                    11/6/2020

24                    Dated




25                    VERONICA LAINE WILLIAMS-BRANCH,  
26                    Respondent

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1 I have reviewed the Stipulation and Waiver as to form and content and have advised my client  
2 accordingly.

3 11/6/2020  
4 Dated

5   
6 ED GONZALEZ, Attorney for Respondent

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8 I have read the Statement of Issues filed herein and the foregoing Stipulation and Waiver  
9 signed by Respondent. I am satisfied that the hearing for the purpose of requiring further proof as to  
10 the honesty and truthfulness of Respondent need not be called and that it will not be inimical to the  
11 public interest to issue a restricted real estate salesperson license to Respondent.

12 Therefore, IT IS HEREBY ORDERED that a restricted real estate salesperson license be  
13 issued to Respondent, if Respondent has otherwise fulfilled all of the statutory requirements for  
14 licensure. The restricted license shall be limited, conditioned, and restricted as specified in the  
15 foregoing Stipulation and Waiver.

16 This Order is effective immediately.

17 IT IS SO ORDERED 12.15.20

18 DOUGLAS R. McCAULEY  
19 REAL ESTATE COMMISSIONER

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