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FILED

APR 25 2012

DEPARTMENT OF REAL ESTATE
By R. Mat

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of	)	
	)	NO. H-4331 SD
MARJORIE ELLWOOD SANTISTEVAN,	)	
	)	<u>ACCUSATION</u>
Respondent.	)	
_____	)	

The Complainant, VERONICA KILPATRICK, in her official capacity as a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against MARJORIE ELLWOOD SANTISTEVAN, also known as "Marjorie Ellwood Jordan" (hereinafter "Respondent"), is informed and alleges as follows:

1

Respondent is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the Business and Professions Code (the Code) as a real estate salesperson.

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On or about July 7, 2010, in the Superior Court of the State of California, County of San Diego, Case No. SCD 225159, Respondent was convicted of violating Section 496(a) of the California Penal Code (Receiving Stolen Property), a misdemeanor and a crime which bears

1 a substantial relationship under Section 2910, Title 10, of the California Code of Regulations, to
2 the qualifications, functions or duties of a real estate licensee.

3 3

4 The facts alleged in Paragraph 2, above, constitute cause under Sections 10177(b)
5 (Conviction of Crime) and 490 (Conviction of Substantially Related Crime) of the Code for the
6 suspension or revocation of all licenses and license rights of Respondent under the Real Estate
7 Law.

8 COST RECOVERY

9 Section 10106 of the Code provides, in pertinent part, that in any order issued in
10 resolution of a disciplinary proceeding before the Department, the Commissioner may request
11 the Administrative Law Judge to direct a licensee found to have committed a violation of this
12 part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the
13 case.

14 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
15 of this Accusation and that upon proof thereof, a Decision be rendered imposing disciplinary
16 action against all licenses and license rights of Respondent under the Code, for the reasonable
17 costs of investigation and prosecution of this case, including agency attorney's fees and for such
18 other and further relief as may be proper under provisions of law.

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22 VERONICA KILPATRICK
23 Deputy Real Estate Commissioner

24 Dated at San Diego, California,

25 this 5 day of April, 2012.
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