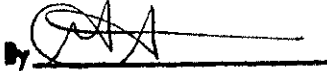


FILED

DEC 19 2011

DEPARTMENT OF REAL ESTATE



Department of Real Estate
P.O. Box 187007
Sacramento, CA 95818-7007
Telephone: (916) 227-0789

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of

JOY DEVELOPMENT COMPANY, INC.,
a California Corporation, ROCKY TED JOY,
JULIE S. THOMPSON and
TERRI JULIE STEVENS,

Respondent.

No. H-5422 SAC

OAH No. 2011050653

STIPULATION AND AGREEMENT
IN SETTLEMENT AND ORDER
AS TO TERRI JULIE STEVENS
ONLY

It is hereby stipulated by and between TERRI JULIE STEVENS (Respondent) and the Complainant, acting by and through Angela L. Cash, Counsel for the Department of Real Estate, as follows for the purpose of settling and disposing of the Accusation filed on July 12, 2010 in this matter:

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

///

1 2. Respondent has received, read and understands the Statement to
2 Respondent, and the Discovery Provisions of the APA filed by the Department of Real Estate in
3 this proceeding.

4 3. Respondent filed a Notice of Defense pursuant to Section 11505 of the
5 Government Code for the purpose of requesting a hearing on the allegations in the Accusation.
6 Respondent hereby freely and voluntarily withdraws said Notice of Defense. Respondent
7 acknowledges that she understands that by withdrawing said Notice of Defense she will thereby
8 waive her right to require the Commissioner to prove the allegations in the Accusation at a
9 contested hearing held in accordance with the provisions of the APA, and that she will waive
10 other rights afforded to her in connection with the hearing such as the right to present evidence in
11 defense of the allegations in the Accusation and the right to cross-examine witnesses.

12 4. This stipulation is based on the factual allegations contained in the
13 Accusation. In the interest of expediency and economy, Respondent chooses not to contest these
14 factual allegations, but to remain silent and understands that, as a result thereof, these factual
15 allegations, without being admitted or denied, will serve as a prima facie basis for the
16 "Determination of Issues" and "Order" set forth below. The Real Estate Commissioner shall not
17 be required to provide further evidence to prove such allegations.

18 5. This Stipulation and Respondent's decision not to contest the Accusation
19 are made for the purpose of reaching an agreed disposition of this proceeding and are expressly
20 limited to this proceeding and any other proceeding or case in which the Department of Real
21 Estate (the Department), the state or federal government, an agency of this state, or an agency of
22 another state is a party.

23 6. It is understood by the parties that the Real Estate Commissioner may
24 adopt the Stipulation and Agreement as her decision in this matter thereby imposing the penalty
25 and sanctions on the real estate licenses and license rights of Respondent as set forth in the
26 below "Order". In the event that the Commissioner in her discretion does not adopt the
27 Stipulation and Agreement in Settlement, it shall be void and of no effect, and Respondent shall

1 retain the right to a hearing and proceeding on the Accusation under all the provisions of the
2 APA and shall not be bound by any admission or waiver made herein.

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

7 DETERMINATION OF ISSUES

8 By reason of the foregoing stipulations, admissions, and waivers, and for the
9 purpose of settlement of the pending Accusation without a hearing, it is stipulated and agreed
10 that the following determinations of issues shall be made:

11 The acts and/or omissions of Respondent TERRI JULIE STEVENS as stipulated
12 above constitute grounds for disciplinary action against the real estate licenses and license rights
13 of Respondent under the provision of Section 11018.2 in conjunction with Section 10177(d) of
14 the California Business and Professions Code (the Code) and 10177(g) of the Code.

15 ORDER

16 All licenses and licensing rights of Respondent TERRI JULIE STEVENS under
17 the Real Estate Law are suspended for a period of thirty (30) days from the effective date of the
18 Decision herein; provided, however, thirty (30) days of said suspension shall be stayed for two
19 (2) years upon the following terms and conditions:

20 (a) Respondent shall obey all laws, rules and regulations governing the
21 rights, duties and responsibilities of a real estate licensee in the State of California; and,

22 (b) That no final subsequent determination be made, after hearing or upon
23 stipulation, that cause for disciplinary action occurred within two (2) years from the effective
24 date of this Order. Should such a determination be made, the Commissioner may, in her
25 discretion, vacate and set aside the stay order and reimpose all or a portion of the stayed
26 suspension. Should no such determination be made, the stay imposed herein shall become
27 permanent.

11/4/11

DATED

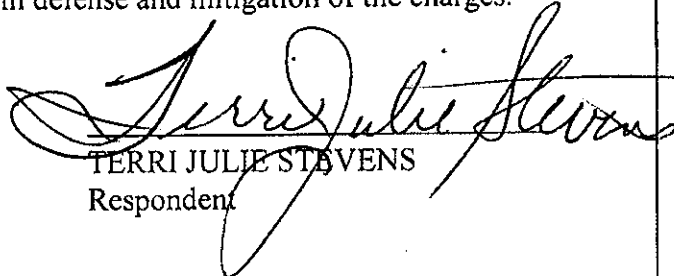


ANGELA L. CASH
Counsel for Complainant

I have read the Stipulation and Agreement in Settlement and its terms are understood by me and are agreeable and acceptable to me. I understand that I am waiving rights given to me by the California Administrative Procedure Act, and I willingly, intelligently and voluntarily waive those rights, including the right of requiring the Commissioner to prove the allegations in the Accusation at a hearing at which I would have the right to cross-examine witnesses against me and to present evidence in defense and mitigation of the charges.

October 28, 2011

DATED



TERRI JULIE STEVENS
Respondent

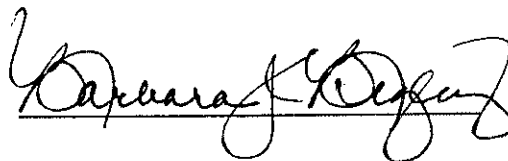
The foregoing Stipulation and Agreement in Settlement and Order is hereby adopted as my Decision and shall become effective at 12 o'clock noon on

1/09/12

IT IS SO ORDERED

12/7/11

BARBARA J. BIGBY
Acting Real Estate Commissioner



FILED

DEC 19 2011

DEPARTMENT OF REAL ESTATE



Department of Real Estate
P.O. Box 187007
Sacramento, CA 95818-7007
Telephone: (916) 227-0789

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of

JOY DEVELOPMENT COMPANY, INC.,
a California Corporation, ROCKY TED JOY,
JULIE S. THOMPSON and
TERRI JULIE STEVENS,

Respondent.

No. H-5422 SAC

OAH No. 2011050653

STIPULATION AND AGREEMENT
IN SETTLEMENT AND ORDER
AS TO JULIE S. THOMPSON
ONLY

It is hereby stipulated by and between JULIE S. THOMPSON (Respondent) and the Complainant, acting by and through Angela L. Cash, Counsel for the Department of Real Estate, as follows for the purpose of settling and disposing of the Accusation filed on July 12, 2010 in this matter:

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

///

1 2. Respondent has received, read and understands the Statement to
2 Respondent, and the Discovery Provisions of the APA filed by the Department of Real Estate in
3 this proceeding.

4 3. Respondent filed a Notice of Defense pursuant to Section 11505 of the
5 Government Code for the purpose of requesting a hearing on the allegations in the Accusation.
6 Respondent hereby freely and voluntarily withdraws said Notice of Defense. Respondent
7 acknowledges that she understands that by withdrawing said Notice of Defense she will thereby
8 waive her right to require the Commissioner to prove the allegations in the Accusation at a
9 contested hearing held in accordance with the provisions of the APA, and that she will waive
10 other rights afforded to her in connection with the hearing such as the right to present evidence in
11 defense of the allegations in the Accusation and the right to cross-examine witnesses.

12 4. This stipulation is based on the factual allegations contained in the
13 Accusation. In the interest of expediency and economy, Respondent chooses not to contest these
14 factual allegations, but to remain silent and understands that, as a result thereof, these factual
15 allegations, without being admitted or denied, will serve as a prima facie basis for the
16 "Determination of Issues" and "Order" set forth below. The Real Estate Commissioner shall not
17 be required to provide further evidence to prove such allegations.

18 5. This Stipulation and Respondent's decision not to contest the Accusation
19 are made for the purpose of reaching an agreed disposition of this proceeding and are expressly
20 limited to this proceeding and any other proceeding or case in which the Department of Real
21 Estate (the Department), the state or federal government, an agency of this state, or an agency of
22 another state is a party.

23 6. It is understood by the parties that the Real Estate Commissioner may
24 adopt the Stipulation and Agreement as her decision in this matter thereby imposing the penalty
25 and sanctions on the real estate licenses and license rights of Respondent as set forth in the
26 below "Order". In the event that the Commissioner in her discretion does not adopt the
27 Stipulation and Agreement in Settlement, it shall be void and of no effect, and Respondent shall

1 retain the right to a hearing and proceeding on the Accusation under all the provisions of the
2 APA and shall not be bound by any admission or waiver made herein.

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

7 DETERMINATION OF ISSUES

8 By reason of the foregoing stipulations, admissions, and waivers, and for the
9 purpose of settlement of the pending Accusation without a hearing, it is stipulated and agreed
10 that the following determinations of issues shall be made:

11 The acts and/or omissions of Respondent JULIE S. THOMPSON as stipulated
12 above constitute grounds for disciplinary action against the real estate licenses and license rights
13 of Respondent under the provision of Section 11018.2 in conjunction with Section 10177(d) of
14 the California Business and Professions Code (the Code) and 10177(g) of the Code.

15 ORDER

16 All real estate licenses and license rights of Respondent JULIE S. THOMPSON
17 are publicly reprovod pursuant to Section 495 of the Code.

18
19 11/4/11

20 DATED

21
22 

23 ANGELA L. CASH
24 Counsel for Complainant
25
26
27

///

///

///

///

///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

I have read the Stipulation and Agreement in Settlement and its terms are understood by me and are agreeable and acceptable to me. I understand that I am waiving rights given to me by the California Administrative Procedure Act, and I willingly, intelligently and voluntarily waive those rights, including the right of requiring the Commissioner to prove the allegations in the Accusation at a hearing at which I would have the right to cross-examine witnesses against me and to present evidence in defense and mitigation of the charges.

October 27, 2011

DATED

Julie S. Thompson
JULIE S. THOMPSON
Respondent

The foregoing Stipulation and Agreement in Settlement and Order is hereby
adopted as my Decision and shall become effective at 12 o'clock noon on

1/09/12

IT IS SO ORDERED

12/7/11

BARBARA J. BIGBY
Acting Real Estate Commissioner

Barbara J. Bigby

FILED

DEC 19 2011

DEPARTMENT OF REAL ESTATE

By [Signature]

Department of Real Estate
P.O. Box 187007
Sacramento, CA 95818-7007

Telephone: (916) 227-0789

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of

JOY DEVELOPMENT COMPANY, INC.,
a California Corporation, ROCKY TED JOY,
JULIE S. THOMPSON and
TERRI JULIE STEVENS,
Respondent.

No. H-5422 SAC

OAH No. 2011050653

STIPULATION AND AGREEMENT
IN SETTLEMENT AND ORDER
AS TO JOY DEVELOPMENT
COMPANY, INC. AND ROCKY
TED JOY ONLY

It is hereby stipulated by and between JOY DEVELOPMENT COMPANY, INC.,
and ROCKY TED JOY (Respondents) and the Complainant, acting by and through Angela L.
Cash, Counsel for the Department of Real Estate, as follows for the purpose of settling and
disposing of the Accusation filed on July 12, 2010 in this matter:

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

1 2. Respondents have received, read and understand the Statement to
2 Respondent, and the Discovery Provisions of the APA filed by the Department of Real Estate in
3 this proceeding.

4 3. Respondents filed a Notice of Defense pursuant to Section 11505 of the
5 Government Code for the purpose of requesting a hearing on the allegations in the Accusation.
6 Respondents hereby freely and voluntarily withdraw said Notice of Defense. Respondents
7 acknowledge that they understand that by withdrawing said Notice of Defense they will thereby
8 waive their right to require the Commissioner to prove the allegations in the Accusation at a
9 contested hearing held in accordance with the provisions of the APA, and that they will waive
10 other rights afforded to them in connection with the hearing such as the right to present evidence
11 in defense of the allegations in the Accusation and the right to cross-examine witnesses.

12 4. This stipulation is based on the factual allegations contained in the
13 Accusation. In the interest of expediency and economy, Respondents choose not to contest these
14 factual allegations, but to remain silent and understand that, as a result thereof, these factual
15 allegations, without being admitted or denied, will serve as a prima facie basis for the
16 "Determination of Issues" and "Order" set forth below. The Real Estate Commissioner shall not
17 be required to provide further evidence to prove such allegations.

18 5. This Stipulation and Respondents' decision not to contest the Accusation
19 are made for the purpose of reaching an agreed disposition of this proceeding and are expressly
20 limited to this proceeding and any other proceeding or case in which the Department of Real
21 Estate (the Department), the state or federal government, an agency of this state, or an agency of
22 another state is a party.

23 6. It is understood by the parties that the Real Estate Commissioner may
24 adopt the Stipulation and Agreement as her decision in this matter thereby imposing the penalty
25 and sanctions on the real estate licenses and license rights of Respondents as set forth in the
26 below "Order". In the event that the Commissioner in her discretion does not adopt the
27 Stipulation and Agreement in Settlement, it shall be void and of no effect, and Respondents

1 shall retain the right to a hearing and proceeding on the Accusation under all the provisions of
2 the APA and shall not be bound by any admission or waiver made herein.

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

7 DETERMINATION OF ISSUES

8 By reason of the foregoing stipulations, admissions, and waivers, and for the
9 purpose of settlement of the pending Accusation without a hearing, it is stipulated and agreed
10 that the following determinations of issues shall be made:

11 The acts and/or omissions of Respondents JOY DEVELOPMENT COMPANY,
12 INC. and ROCKY TED JOY as stipulated above constitute grounds for disciplinary action
13 against the real estate licenses and license rights of Respondents under the provision of Section
14 11018.2 in conjunction with Section 10177(d) of the California Business and Professions Code
15 (the Code) and 10177(g) of the Code.

16 ORDER

17 All licenses and licensing rights of Respondents JOY DEVELOPMENT
18 COMPANY, INC. and ROCKY TED JOY under the Real Estate Law are suspended for a
19 period of thirty (30) days from the effective date of the Decision herein; provided, however,
20 thirty (30) days of said suspension shall be stayed for two (2) years upon the following terms
21 and conditions:

22 (a) Respondents shall obey all laws, rules and regulations governing the
23 rights, duties and responsibilities of a real estate licensee in the State of California; and,

24 (b) That no final subsequent determination be made, after hearing or upon
25 stipulation, that cause for disciplinary action occurred within two (2) years from the effective
26 date of this Order. Should such a determination be made, the Commissioner may, in her
27 discretion, vacate and set aside the stay order and reimpose all or a portion of the stayed

1 suspension. Should no such determination be made, the stay imposed herein shall become
2 permanent.

3 10/4/11

4 DATED



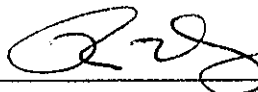
ANGELA L. CASH
Counsel for Complainant

6 ***

7 I have read the Stipulation and Agreement in Settlement and its terms are
8 understood by me and are agreeable and acceptable to me. I understand that I am waiving rights
9 given to me by the California Administrative Procedure Act, and I willingly, intelligently and
10 voluntarily waive those rights, including the right of requiring the Commissioner to prove the
11 allegations in the Accusation at a hearing at which I would have the right to cross-examine
12 witnesses against me and to present evidence in defense and mitigation of the charges.

13
14 10/28/11

15 DATED



JOY DEVELOPMENT COMPANY, INC.
Respondent

16
17
18 10/28/11

19 DATED



ROCKY TED JOY
Respondent

20
21 ///

22 ///

23 ///

24 ///

25 ///

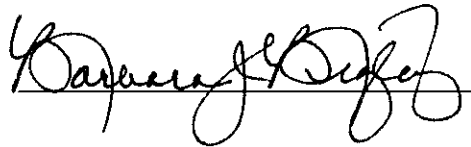
26
27

The foregoing Stipulation and Agreement in Settlement and Order is hereby
adopted as my Decision and shall become effective at 12 o'clock noon on

1/09/12

IT IS SO ORDERED 12/7/11

BARBARA J. BIGBY
Acting Real Estate Commissioner



1 ANGELA L. CASH, Counsel
2 State Bar No. 230882
3 Department of Real Estate
4 P.O. Box 187007
5 Sacramento, CA 95818-7007

6 Telephone: (916) 227-0789
7 (916) 227-0805 (Direct)

FILED

JUL 12 2010

DEPARTMENT OF REAL ESTATE

[Signature]

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of

No. H-5422 SAC

12 JOY DEVELOPMENT COMPANY, INC.,
13 a California Corporation, ROCKY TED JOY,
14 JULIE S. THOMPSON and
15 TERRI JULIE STEVENS,

ACCUSATION

16 Respondents.

17
18 The Complainant, Tricia Sommers, a Deputy Real Estate Commissioner of the
19 State of California, for cause of Accusation against JOY DEVELOPMENT COMPANY, INC., a
20 California Corporation doing business as ERA Joy Realty (hereinafter "JOY
21 DEVELOPMENT"), ROCKY TED JOY (hereinafter "ROCKY"), JULIE S. THOMPSON
22 (hereinafter "THOMPSON") and TERRI JULIE STEVENS (hereinafter "STEVENS")
23 (collectively referred to as "Respondents") is informed and alleges as follows:

24 1

25 Complainant makes this Accusation in her official capacity.

26 ///

27 ///

2

Respondents are presently licensed and/or have license rights under the Real Estate Law (Part 1 of Division 4 of the California Business and Professions Code) (hereinafter "Code").

3

At all times herein mentioned, Respondent JOY DEVELOPMENT was and now is licensed by the Department of Real Estate of the State of California (hereinafter "the Department") as a corporate real estate broker by and through Respondent ROCKY as designated officer-broker of Respondent JOY DEVELOPMENT to qualify said corporation and to act for said corporation as a real estate broker.

4

At all times herein mentioned, Respondent ROCKY was licensed as a real estate broker individually and beginning approximately June 25, 1989 as the designated broker-officer for Respondent JOY DEVELOPMENT. As said designated officer-broker, Respondent ROCKY was at all times mentioned herein responsible pursuant to Section 10159.2 of the Code for the supervision of the activities of the officers, agents, real estate licensees and employees of Respondent JOY DEVELOPMENT for which a license is required.

5

At all times herein mentioned, Respondent JOY DEVELOPMENT acted in the capacity of, advertised, or assumed to act as a real estate broker within the State of California within the meaning of Sections 10131(a) of the Code, including the operation and conduct of a real estate brokerage business with the public wherein, on behalf of others, for compensation or in expectation of compensation, Respondent sold and offered to sell, solicited prospective sellers and purchasers of, and negotiated the purchase and sale of real property.

///

///

///

6

Whenever reference is made in an allegation in this Accusation to an act or omission of Respondent JOY DEVELOPMENT, such allegation shall be deemed to mean that the officers, directors, employees, agents and real estate licensees employed by or associated with Respondent JOY DEVELOPMENT committed such act or omission while engaged in the furtherance of the business or operations of Respondent JOY DEVELOPMENT and while acting within the course and scope of their corporate authority and employment.

7

At all times material herein, Respondent THOMPSON was licensed as real estate salesperson in the employ of Respondent JOY DEVELOPMENT.

8

At all times material herein, Respondent STEVENS was licensed as real estate broker.

9

At all times mentioned herein Respondents were the owners or subdividers, or agents of the owners or subdividers of subdivided lands as defined in Sections 11000 and 11003 of the Code.

10

Said subdivision is known as or commonly called "Mountain View Mobile Home Park", and is located in or near the County of Lassen, State of California (hereinafter "Subdivision").

11

On approximately October 23, 1998, the Department issued a Final Subdivision Public Report (hereinafter "final public report") to Wilson Myers & Myers LP (hereinafter "WMM"), File No. 035340SA-F00 covering lots 1 through 34 in the Subdivision, Phase 1. The final public report expired on October 22, 2003 and was not renewed by WMM.

///

12

The final public report identified in paragraph 11, above, authorized WMM to offer for sale, negotiate the sale and sell the lots covered by the final public report as identified in paragraph 11, above.

13

On approximately June 20, 2006, WMM submitted a Public Report Amendment/Renewal Application (hereinafter "application") to amend the final public report previously issued to WMM on approximately October 23, 1998 identified in Paragraph 11, above. By this application, WMM sought to reduce the number of lots offered in Phase 1 from 34 lots to 12 lots, covering Lots 4, 7, 8, 9, 10, 11, 12, 15, 20, 21, 26 and 27. To date, the Department has not issued an Amended Public Report to WMM or any of its representatives.

14

From approximately February 2007 through March 2008, without obtaining a public report authorizing such offering, negotiation, or sale, Respondents JOY DEVELOPMENT, ROCKY and THOMPSON solicited prospective purchasers, offered for sale, and entered into contracts on lots in the Subdivision including but not limited to:

Lot	Purchaser(s)	Contract Date	Close of Escrow
9	Jere and Jenine Giblin Living Trust	February 20, 2007	July 12, 2007
8	Lewis and Nancy Thompson	March 28, 2008	May 15, 2008

15

The acts and omissions of Respondents JOY DEVELOPMENT, ROCKY and THOMPSON described in Paragraph 14, above, violate Section 11018.2 of the Code (no offering to sell or selling without a public report) and constitute cause for the suspension or revocation of the licenses and license rights of Respondents JOY DEVELOPMENT, ROCKY and THOMPSON under Section 10177(d) (suspension or revocation of license for willful disregard

///

1 or violation of the Real Estate Law §§ 10000 et seq. of the Code, or of the Regulations) of the
2 Code.

3 16

4 The acts and omissions of Respondent JOY DEVELOPMENT, ROCKY and
5 THOMPSON described in Paragraph 14, above, constitute cause for the suspension or revocation
6 of the licenses and license rights of Respondents JOY DEVELOPMENT, ROCKY and
7 THOMPSON under Section 10177(g) (demonstrated negligence or incompetence in performing
8 an act for which he or she is required to hold a license) of the Code.

9 17

10 The acts and omissions of Respondent ROCKY described in Paragraph 14,
11 above, constitute failure on the part of Respondent ROCKY, as designated broker-officer of
12 Respondent JOY DEVELOPMENT, to exercise reasonable supervision and control over the
13 licensed activities of Respondents JOY DEVELOPMENT and THOMPSON as required by
14 Section 10159.2 (designated broker/officer responsible for supervision and control of activities
15 conducted on behalf of corporation by officers, licensed salespersons and employees to secure
16 compliance with the Real Estate Law) which constitute grounds for the suspension or revocation
17 of the licenses and license rights of Respondent ROCKY under Section 10177(g) (demonstrated
18 negligence or incompetence in performing an act for which he or she is required to hold a
19 license) and/or 10177(h) (suspension or revocation for broker or designated broker/officer who
20 fails to exercise reasonable supervision of licensed employees or licensed activities of broker
21 corporation).

22 18

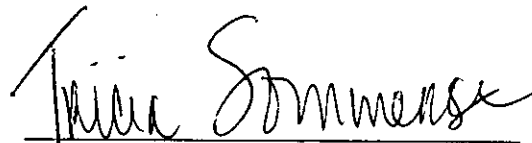
23 In approximately October 2007, without obtaining a public report authorizing
24 such offering, negotiation, or sale, Respondent STEVENS solicited prospective purchasers,
25 offered for sale and entered into contracts on lots in the Subdivision including but not limited to
26 entering into a contract with Keith D. Jones (lot 15), closing escrow on December 3, 2007.

27 ///

The acts and omissions of Respondent STEVENS described in Paragraph 18, above, violate Section 11018.2 of the Code (no offering to sell or selling without a public report) and constitute cause for the suspension or revocation of the licenses and license rights of Respondent STEVENS under Section 10177(d) (suspension or revocation of license for willful disregard or violation of the Real Estate Law §§ 10000 et seq. of the Code, or of the Regulations) of the Code.

The acts and omissions of Respondent STEVENS described in Paragraph 18, above, constitute cause for the suspension or revocation of the licenses and license rights of Respondent STEVENS under Section 10177(g) (demonstrated negligence or incompetence in performing an act for which he or she is required to hold a license) of the Code.

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof a decision be rendered imposing disciplinary action against all licenses and license rights of Respondents under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code) and for such other and further relief as may be proper under other provisions of law.



TRICIA SOMMERS

Deputy Real Estate Commissioner

Dated at Sacramento, California,
this 12th day of July, 2010