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**FILED**

FEB 21 2025

DEPT. OF REAL ESTATE

By [REDACTED]

BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

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In the Matter of the Accusation of ) No. H-05756 SD  
)  
SOUTHEAST SAN DIEGO )  
REAL ESTATE INC., doing business as )  
Lepe Tendwell Commercial and )  
Lepe Tendwell Properties, and )  
VOLTAIRE VLADIMIR LEPE, )  
individually and as designated officer of )  
Southeast San Diego Real Estate Inc., )  
)  
Respondents. )  
)

It is hereby stipulated by and between Respondents SOUTHEAST SAN DIEGO  
REAL ESTATE INC. and VOLTAIRE VLADIMIR LEPE ("Respondents"), represented by  
Dwayne H. Stein, and the Complainant, acting by and through Steve Chu, Attorney for the  
Department of Real Estate ("Department"), as follows for the purpose of settling and disposing  
of the Accusation filed on December 15, 2023, in this matter:

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

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

9           3.       On January 26, 2024, Respondents filed Notices of Defense pursuant to  
10 Section 11506 of the Government Code for the purpose of requesting a hearing on the  
11 allegations in the Accusation. Respondents hereby freely and voluntarily withdraw said  
12 Notices of Defense. Respondents acknowledge that Respondents understand that by  
13 withdrawing said Notice of Defense, Respondents will thereby waive Respondents' right to  
14 require the Real Estate Commissioner ("Commissioner") to prove the allegations in the  
15 Accusation at a contested hearing held in accordance with the provisions of the APA and that  
16 Respondents will waive other rights afforded to Respondents in connection with the hearing  
17 such as the right to present evidence in defense of the allegations in the Accusation and the  
18 right to cross-examine witnesses.

19           4.       Respondents, pursuant to the limitations set forth below, hereby admit  
20 that the factual allegations in the Accusation filed in this proceeding are true and correct and  
21 the Commissioner shall not be required to provide further evidence to prove such allegations.

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1           5.     It is understood by the parties that the Real Estate Commissioner may  
2 adopt the Stipulation as her Decision in this matter, thereby imposing the penalty and sanctions  
3 on Respondents' real estate licenses and license rights as set forth in the below Order. In the  
4 event that the Commissioner in her discretion does not adopt the Stipulation, it shall be void  
5 and of no effect, and Respondents shall retain the right to a hearing and proceeding on the  
6 Accusation under all the provisions of the APA and shall not be bound by any admission or  
7 waiver made herein.

8           6.     The Order or any subsequent Order of the Commissioner made pursuant  
9 to this Stipulation shall not constitute an estoppel, merger or bar to any further administrative or  
10 civil proceedings by the Department with respect to any matters which were not specifically  
11 alleged to be causes for the Accusation in this proceeding.

12                               DETERMINATION OF ISSUES

13                 By reason of the foregoing stipulations, admissions, and waivers, and solely for  
14 the purpose of settlement of the pending Accusation without a hearing, it is stipulated and  
15 agreed that the following Determination of Issues shall be made:

16                               I.

17                 The conduct, acts, and/or omissions of Respondent SOUTHEAST SAN DIEGO  
18 REAL ESTATE INC., as described in the Accusation, constitute cause for the suspension or  
19 revocation of all real estate licenses, license endorsements, and license rights of Respondent  
20 SOUTHEAST SAN DIEGO REAL ESTATE INC. under California Business and Professions  
21 Code ("Code") sections 10176(a), 10177(d), and 10177(g) for violation of Code  
22 sections 10176(a), 10177(d), and 10177(g).

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1 II.

2 The conduct, acts, and/or omissions of Respondent VOLTAIRE VLADIMIR  
3 LEPE, as described in the Accusation, constitute cause for the suspension or revocation of all  
4 real estate licenses, license endorsements, and license rights of Respondent VOLTAIRE  
5 VLADIMIR LEPE under Code sections 10176(a), 10177(d), 10177(g), and 10177(j) for  
6 violation of Code sections 10176(a), 10177(d), 10177(g), and 10177(j).

7 ORDER

8 I.

9 1. Respondent SOUTHEAST SAN DIEGO REAL ESTATE INC. is  
10 publicly reprovod.

11 2. All licenses, license endorsements, and license rights of Respondent  
12 SOUTHEAST SAN DIEGO REAL ESTATE INC. are indefinitely suspended unless or until  
13 Respondent SOUTHEAST SAN DIEGO REAL ESTATE INC. pays, jointly and severally with  
14 Respondent VOLTAIRE VLADIMIR LEPE, the sum of \$5,957.60 for the Commissioner's  
15 reasonable cost of the investigation and enforcement which led to this disciplinary action. Said  
16 payment shall be in the form of a cashier's check made payable to the Department of Real  
17 Estate. The investigative and enforcement costs must be delivered to the Department of Real  
18 Estate, Flag Section at 651 Bannan Street, Suite 504, Sacramento, CA 95811, prior to the  
19 effective date of this Decision and Order.

20 II.

21 1. Respondent VOLTAIRE VLADIMIR LEPE is publicly reprovod.

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2. All licenses, license endorsements, and license rights of Respondent VOLTAIRE VLADIMIR LEPE are indefinitely suspended unless or until Respondent VOLTAIRE VLADIMIR LEPE pays, jointly and severally with Respondent SOUTHEAST SAN DIEGO REAL ESTATE INC., the sum of \$5,957.60 for the Commissioner's reasonable cost of the investigation and enforcement which led to this disciplinary action. Said payment shall be in the form of a cashier's check made payable to the Department of Real Estate. The investigative and enforcement costs must be delivered to the Department of Real Estate, Flag Section at 651 Bannon Street, Suite 504, Sacramento, CA 95811, prior to the effective date of this Decision and Order.

DATED: 10/29/2024

  
Steve Chu, Attorney  
Department of Real Estate

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We have read the Stipulation and Agreement. We understand that we are waiving rights given to us by the California Administrative Procedure Act, (including but not limited to sections 11521 and 11523 of the Government Code), and we willingly, intelligently, and voluntarily waive those rights, including the right to seek reconsideration and the right to seek judicial review of the Commissioner's Decision and Order by way of a writ of mandate.

We agree, acknowledge, and understand that we cannot rescind or amend this Stipulation and Agreement.

We can signify acceptance and approval of the terms and conditions of this Stipulation and Agreement by mailing the original signed Stipulation and Agreement to: Steve Chu, Department of Real Estate, 320 West 4th Street, Suite 350, Los Angeles, California 90013-1105. Steve Chu must receive the original signed Stipulation and Agreement or a copy faxed to (213) 576-6917 by October 29, 2024; if not, this Stipulation and Agreement is invalid and void because the sum for the Commissioner's reasonable cost of the investigation and enforcement which led to this disciplinary action will increase.


DATED: 10/29/2024

  
SOUTHEAST SAN DIEGO REAL ESTATE INC.  
Respondent  
By VOLTAIRE VLADIMIR LEPE,  
as designated officer of  
SOUTHEAST SAN DIEGO REAL ESTATE INC.

DATED: 10/29/2024

  
VOLTAIRE VLADIMIR LEPE  
Respondent

DATED: 10/29/2024


  
Dwayne H. Stein  
Counsel for Respondents  
Approved as to Form

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The foregoing Stipulation and Agreement is hereby adopted by me as my  
Decision in this matter as to Respondents SOUTHEAST SAN DIEGO REAL ESTATE INC.  
and VOLTAIRE VLADIMIR LEPE, and shall become effective at 12 o'clock noon  
on 3/13/2025.

IT IS SO ORDERED

1/7/2025  
CHIKA SUNQUIST  
REAL ESTATE COMMISSIONER

  
By: Marcus L. McCarther  
Chief Deputy Real Estate Commissioner