

FILED

FEB 12 2025

DEPARTMENT OF REAL ESTATE

By By deed

Department of Real Estate
651 Bannon Street, Suite 507
Sacramento, CA 95811

Telephone: (916) 576-8700
Fax: (916) 263-3767

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of

No. H-7212 SAC

AAA ADVANTAGE REALTY, INC.,
SANDRA JO STEVENSON,
and NADENE M. BERRYESSA,

STIPULATION AND AGREEMENT
IN SETTLEMENT AND ORDER

Respondents.

It is hereby stipulated by and between AAA ADVANTAGE REALTY, INC. (AAA ADVANTAGE), SANDRA JO STEVENSON (STEVENSON), represented by Tom Gifford, NADENE M. BERRYESSA (BERRYESSA), represented by Mary Work, and the Complainant, acting by and through Megan Lee Olsen, Counsel for the Department of Real Estate (Department), as follows for the purpose of settling and disposing of the Accusation filed on February 7, 2024, in this matter¹:

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

¹ AAA ADVANTAGE REALTY, INC., SANDARA JO STEVENSON, and NADENE M. BERRYESSA shall also be collectively referred to as Respondents in the Stipulation and Agreement in Settlement and Order.

(APA), shall instead and in place thereof be submitted solely on the basis of the provisions of this Stipulation and Agreement In Settlement and Order (Stipulation).

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

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

4. This Stipulation is based on the factual allegations contained in the Accusation. In the interest of expediency and economy, Respondents choose not to contest these factual allegations, but to remain silent and understand that, as a result thereof, these factual statements will serve as a prima facie basis for the "Determination of Issues" and "Order" set forth below. The Commissioner shall not be required to provide further evidence to prove such allegations.

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

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

7. Respondents understand that by agreeing to this Stipulation, Respondents agree to pay, pursuant to Section 10106 of the Business and Professions Code (Code), the cost of the investigation which resulted in the violations found in the Determination of Issues. The amount of such costs is \$2,830.75.

DETERMINATION OF ISSUES

AAA ADVANTAGE REALTY, INC.

By reason of the foregoing stipulations, admissions and waivers, and solely for the purpose of settlement of the pending Accusation without a hearing, it is stipulated and agreed that the acts and/or omissions of Respondents, as described in the Accusation, constitute grounds for the suspension or revocation of the licenses and license rights of Respondents under the provisions of Sections 10177 (d), and 10177 (g) of the Code.

SANDRA JO STEVENSON

By reason of the foregoing stipulations, admissions and waivers, and solely for the purpose of settlement of the pending Accusation without a hearing, it is stipulated and agreed that the acts and/or omissions of Respondents, as described in the Accusation, constitute grounds for the suspension or revocation of the licenses and license rights of Respondents under the provisions of Sections 10177 (d), 10177 (g), and 10177 (h) of the Code.

NADENE M. BERRYESSA

By reason of the foregoing stipulations, admissions and waivers, and solely for the purpose of settlement of the pending Accusation without a hearing, it is stipulated and agreed that the acts and/or omissions of Respondents, as described in the Accusation, constitute grounds for the suspension or revocation of the licenses and license rights of Respondents under the provisions of Sections 10177 (d), and 10177 (g) of the Code.

ORDER

AAA ADVANTAGE REALTY, INC.

All licenses and licensing rights of AAA ADVANTAGE REALTY, INC., under the Real Estate Law are revoked; provided, however, a restricted real estate broker corporation license shall be issued to AAA ADVANTAGE pursuant to Section 10156.5 of the Code if AAA ADVANTAGE makes application therefor and pays to the Department the appropriate fee for the restricted license within 90 days from the effective date of this Decision and Order. The restricted license issued to AAA ADVANTAGE shall be subject to all of the provisions of Section 10156.7 of the Code and to the following limitations, conditions and restrictions imposed under authority of Section 10156.6 of the Code:

1. The restricted broker license issued to AAA ADVANTAGE may be suspended prior to hearing by Order of the Commissioner on evidence satisfactory to the Commissioner that AAA ADVANTAGE has violated provisions of the California Real Estate Law, the Subdivided Lands Law, Regulations of the Real Estate Commissioner or conditions attaching to the restricted license.

2. AAA ADVANTAGE shall not be eligible to apply for the issuance of an unrestricted real estate license nor for removal of any of the conditions, limitations or restrictions of a restricted license until two (2) years have elapsed from the effective date of this Decision and Order. AAA ADVANTAGE shall not be eligible to apply for any unrestricted licenses until all restrictions attaching to the license have been removed.

SANDRA JO STEVENSON

All licenses and licensing rights of SANDRA JO STEVENSON under the Real Estate Law are revoked; provided, however, a restricted real estate broker license shall be issued to STEVENSON pursuant to Section 10156.5 of the Code if STEVENSON makes application therefor and pays to the Department the appropriate fee for the restricted license within 90 days from the effective date of this Decision and Order. The restricted license issued to STEVENSON shall be subject to all of the provisions of Section 10156.7 of the Code and to the

following limitations, conditions and restrictions imposed under authority of Section 10156.6 of that Code:

3. The restricted broker license issued to STEVENSON may be suspended prior to hearing by Order of the Commissioner in the event of STEVENSON's conviction or plea of nolo contendere to a crime which is substantially related to STEVENSON's fitness or capacity as a real estate licensee.

4. The restricted broker license issued to STEVENSON may be suspended prior to hearing by Order of the Commissioner on evidence satisfactory to the Commissioner that STEVENSON has violated provisions of the California Real Estate Law, the Subdivided Lands Law, Regulations of the Real Estate Commissioner or conditions attaching to the restricted license.

5. STEVENSON shall not be eligible to apply for the issuance of an unrestricted license nor for removal of any of the conditions, limitations or restrictions of a restricted license until two (2) years have elapsed from the effective date of this Decision and Order. STEVENSON shall not be eligible to apply for any unrestricted licenses until all restrictions attaching to the license have been removed.

6. STEVENSON shall, within nine (9) months from the effective date of this Decision and Order, present evidence satisfactory to the Commissioner that STEVENSON has, since the most recent issuance of an original or renewal real estate license, taken and successfully completed the continuing education requirements of Article 2.5 of Chapter 3 of the Real Estate Law for renewal of a real estate license. If STEVENSON fails to satisfy this condition, STEVENSON's real estate license shall automatically be suspended until STEVENSON presents evidence satisfactory to the Commissioner of having taken and successfully completed the continuing education requirement. Proof of completion of the continuing education courses must be delivered to the Department of Real Estate, Flag Section at 651 Bannon Street, Suite 504, Sacramento, CA 95811.

///

NADENE M. BERRYESSA

7. All licenses and licensing rights of NADENE M. BERRYESSA under the Real Estate Law are revoked; provided, however, a restricted real estate salesperson license shall be issued to BERRYESSA pursuant to Section 10156.5 of the Code if BERRYESSA makes application therefor and pays to the Department the appropriate fee for the restricted license within 90 days from the effective date of this Decision and Order. The restricted license issued to BERRYESSA shall be subject to all of the provisions of Section 10156.7 of the Code and to the following limitations, conditions and restrictions imposed under authority of Section 10156.6 of that Code:

8. The restricted salesperson license issued to BERRYESSA may be suspended prior to hearing by Order of the Commissioner in the event of BERRYESSA's conviction or plea of nolo contendere to a crime which is substantially related to BERRYESSA's fitness or capacity as a real estate licensee.

9. The restricted salesperson license issued to BERRYESSA may be suspended prior to hearing by Order of the Commissioner on evidence satisfactory to the Commissioner that BERRYESSA has violated provisions of the California Real Estate Law, the Subdivided Lands Law, Regulations of the Real Estate Commissioner or conditions attaching to the restricted license.

10. BERRYESSA shall not be eligible to apply for the issuance of an unrestricted license nor for removal of any of the conditions, limitations or restrictions of a restricted license until three (3) years have elapsed from the effective date of this Decision and Order. BERRYESSA shall not be eligible to apply for any unrestricted licenses until all restrictions attaching to the license have been removed.

11. BERRYESSA shall submit with any application for license under an employing broker, or any application for transfer to a new employing broker, a statement signed by the prospective employing real estate broker on a form approved by the Department which shall certify:

- 1 (a) That the employing broker has read the Decision and Order of the
- 2 Commissioner which granted the right to a restricted license; and
- 3 (b) That the employing broker will exercise close supervision over the
- 4 performance by the restricted licensee relating to activities for which
- 5 a real estate license is required.

6 12. BERRYESSA shall, within nine (9) months from the effective date of this
7 Decision and Order, present evidence satisfactory to the Commissioner that BERRYESSA has,
8 since the most recent issuance of an original or renewal real estate license, taken and successfully
9 completed the continuing education requirements of Article 2.5 of Chapter 3 of the Real Estate
10 Law for renewal of a real estate license. If BERRYESSA fails to satisfy this condition,
11 BERRYESSA's real estate license shall automatically be suspended until BERRYESSA presents
12 evidence satisfactory to the Commissioner of having taken and successfully completed the
13 continuing education requirement. Proof of completion of the continuing education courses must
14 be delivered to the Department of Real Estate, Flag Section at 651 Bannon Street, Suite 504,
15 Sacramento, CA 95811.

16 13. BERRYESSA shall, within six (6) months from the effective date of
17 this Decision and Order, take and pass the Professional Responsibility Examination
18 administered by the Department including the payment of the appropriate examination fee. If
19 BERRYESSA fails to satisfy this condition, the Commissioner may order suspension of
20 BERRYESSA's restricted salesperson license until BERRYESSA passes the examination.

21 AAA ADVANTAGE REALTY, INC., SANDRA JO STEVENSON,

22 and NADENE M. BERRYESSA

23 14. All licenses and licensing rights of Respondents are indefinitely suspended
24 unless or until Respondents, jointly and severally, pay the sum of \$2,830.75 for the
25 Commissioner's reasonable cost of the investigation which led to this disciplinary action. Said
26 payment shall be in the form of a cashier's check made payable to the Department of Real Estate,
27

Flag Section at 651 Bannon Street, Suite 504, Sacramento, CA 95811, prior to the effective date of this Stipulation.

11/9/2025

DATED



MEGAN LEE OLSEN

Counsel for the Department of Real Estate

I have read the Stipulation and Agreement In Settlement and Order, discussed it with my counsel, 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 (including but not limited to Sections 11506, 11508, 11509 and 11513 of the Government Code), 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.

Respondents and Respondents attorney further agree to send the original signed Stipulation by mail to the following address no later than one (1) week from the date the Stipulation is signed by Respondents and Respondents' attorney: *Department of Real Estate, Flag Section at 651 Bannon Street, Suite 504, Sacramento, CA 95811*. Respondents and Respondents' attorney understand and agree that if they fail to return the original signed Stipulation by the due date, Complainant retains the right to set this matter for hearing.

12/27/2024

DATED



AAA ADVANTAGE REALTY, INC.

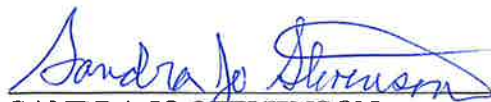
Respondent

By: SANDRA JO STEVENSON

Designated Officer

12/27/2024

DATED



SANDRA JO STEVENSON

Respondent

12/24/2024

DATED

DocuSigned by:



NADENE M. BERRYESSA

Respondent

* * *

I have reviewed the Stipulation and Agreement as to form and content and have advised my client/clients accordingly.

12-30-24

DATED



TOM GIFFORD

Attorney for Respondents
AAA ADVANTAGE REALTY, INC.
and SANDRA JO STEVENSON

DocuSigned by:



DATED

12/24/2024

MARY E. WORK

Attorney for Respondent
NADENE M. BERRYESSA

The foregoing Stipulation and Agreement In Settlement and Order is hereby adopted by the Real Estate Commissioner as her Decision and Order and shall become effective at 12 o'clock noon on MAR 05 2025.

IT IS SO ORDERED 2/5/2025

CHIKA SUNQUIST
Real Estate Commissioner



By: Marcus L. McCarther
Chief Deputy Real Estate Commissioner