

1 Department of Real Estate  
320 West Fourth Street, #350  
2 Los Angeles, California 90013

3 (213) 576-6982  
4 (213) 576-6914

**FILED**  
MAY - 9 2003  
DEPARTMENT OF REAL ESTATE

*[Handwritten signature]*

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of )  
12 ) DRE No. H-29871 LA  
13 PAUL CAMPOS, ) OAH No. L-2003030084  
14 ) STIPULATION AND AGREEMENT  
15 Respondent. )

16 It is hereby stipulated by and between PAUL CAMPOS  
17 (sometimes referred to herein as "Respondent CAMPOS"), acting  
18 by and through Harold R. Stokes, Esq., and the Complainant,  
19 acting by and through Martha J. Rosett, Counsel for the  
20 Department of Real Estate, as follows for the purpose of  
21 settling and disposing of the Accusation filed on  
22 January 9, 2003 in this matter:

23 1. All issues which were to be contested and all  
24 evidence which was to be presented by Complainant and  
25 Respondent at a formal hearing on the Accusation, which hearing  
26 was to be held in accordance with the provisions of the  
27

1 Administrative Procedure Act (APA), shall instead and in place  
2 thereof be submitted solely on the basis of the provisions of  
3 this Stipulation and Agreement.

4           2. Respondent has received, read and understands the  
5 Statement to Respondent, the Discovery Provisions of the APA  
6 and the Accusation filed by the Department of Real Estate in  
7 this proceeding.

8           3. On February 13, 2002, Respondent filed a Notice  
9 of Defense pursuant to Section 11506 of the Government Code for  
10 the purpose of requesting a hearing on the allegations in the  
11 Accusation. In order to effectuate this settlement, Respondent  
12 hereby freely and voluntarily withdraws said Notice of Defense.  
13 Respondent acknowledges that he understands that by withdrawing  
14 said Notice of Defense, he will thereby waive his right to  
15 require the Commissioner to prove the allegations in the  
16 Accusation at a contested hearing held in accordance with the  
17 provisions of the APA and that he will waive other rights  
18 afforded to him in connection with the hearing such as the  
19 right to present evidence in defense of the allegations in the  
20 Accusation and the right to cross-examine witnesses.

21           4. Respondent, pursuant to the limitations set forth  
22 below, although not admitting or denying the truth of the  
23 allegations, will not contest the factual allegations contained  
24 in the Accusation filed in this proceeding and the Real Estate  
25 Commissioner shall not be required to provide further evidence  
26 of such allegations.

27

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

12           6. The Order or any subsequent Order of the Real  
13 Estate Commissioner made pursuant to this Stipulation and  
14 Agreement shall not constitute an estoppel, merger or bar to  
15 any further administrative proceedings by the Department of  
16 Real Estate with respect to any matters which were not  
17 specifically alleged to be causes for accusation in this  
18 proceeding.

19           7. The Stipulation is entered into by each party  
20 with the express understanding and agreement that it is to be  
21 used for the purposes of settling these proceedings only and  
22 that this stipulation shall not be deemed, used, or accepted as  
23 an acknowledgment or stipulation in any other civil or  
24 administrative proceeding to which this Department is not a  
25 party. Said stipulation is expressly limited to these  
26 proceedings and to any further proceeding initiated by or  
27 brought before the Department of Real Estate, and shall have no

1 collateral estoppel or res judicata effect in any proceeding.  
2 other than a proceeding brought by the Department of Real  
3 Estate.

4 DETERMINATION OF ISSUES

5 By reason of the foregoing stipulations and waivers  
6 and solely for the purpose of settlement of the pending  
7 Accusation without a hearing, it is stipulated and agreed that  
8 the following Determination of Issues shall be made:

9 The conduct, acts or omissions of Respondent CAMPOS  
10 as set forth in the Accusation, constitute cause to suspend or  
11 revoke the real estate license and license rights of Respondent  
12 under the provisions of Business and Professions Code ("Code")  
13 Section 10177(a).

14 ORDER

15 WHEREFORE, THE FOLLOWING ORDER is hereby made:

16 All licenses and licensing rights of Respondent PAUL  
17 CAMPOS under the Real Estate Law are revoked; provided,  
18 however, a restricted real estate salesperson license shall be  
19 issued to Respondent pursuant to Section 10156.5 of the  
20 Business and Professions Code if Respondent makes application  
21 therefor and pays to the Department of Real Estate the  
22 appropriate fee for the restricted license within 90 days from  
23 the effective date of this Decision. The restricted license  
24 issued to Respondent shall be subject to all of the provisions  
25 of Section 10156.7 of the Business and Professions Code and to  
26 the following limitations, conditions and restrictions imposed  
27 under authority of Section 10156.6 of that Code:

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

6                   2. The restricted license issued to Respondent may  
7 be suspended prior to hearing by Order of the Commissioner on  
8 evidence satisfactory to the Commissioner that Respondent has  
9 violated provisions of the California Real Estate Law, the  
10 Subdivided Lands Law, Regulations of the Real Estate  
11 Commissioner or conditions attaching to the restricted license.

12                   3. Respondent shall not be eligible to apply for the  
13 issuance of an unrestricted real estate license nor for the  
14 removal of any of the conditions, limitations or restrictions  
15 of a restricted license until two (2) years have elapsed from  
16 the effective date of this Decision.

17                   4. Respondent shall submit with any application for  
18 license under an employing broker, or any application for  
19 transfer to a new employing broker, a statement signed by the  
20 prospective employing real estate broker on a form approved by  
21 the Department of Real Estate which shall certify:

22                   (a) That the employing broker has read the Decision of  
23 the Commissioner which granted the right to a restricted  
24 license; and


25                   (b) That the employing broker will exercise close  
26 supervision over the performance by the restricted  
27

1 licensee relating to the activities for which a real  
2 estate license is required.

3 5. Respondent shall, within nine months from the  
4 effective date of this Decision, present evidence satisfactory  
5 to the Real Estate Commissioner that Respondent has, since the  
6 most recent issuance of an original or renewal real estate  
7 license, taken and successfully completed the continuing  
8 education requirements of Article 2.5 of Chapter 3 of the Real  
9 Estate Law for renewal of a real estate license. If Respondent  
10 fails to satisfy this condition, the Commissioner may order the  
11 suspension of the restricted license until the Respondent  
12 presents such evidence. The Commissioner shall afford  
13 Respondent the opportunity for a hearing pursuant to the  
14 Administrative Procedure Act to present such evidence.

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

22  
23 DATED: 4/8/03

  
\_\_\_\_\_  
MARTHA J. ROSETT  
Counsel for Complainant

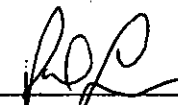
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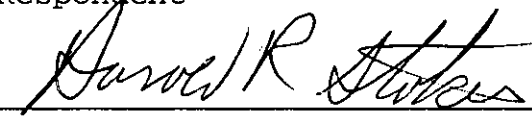
1 I have read the Stipulation and Agreement, have  
2 discussed it with my counsel, and its terms are understood by  
3 me and are agreeable and acceptable to me. I understand that I  
4 am waiving rights given to me by the California Administrative  
5 Procedure Act (including but not limited to Sections 11506,  
6 11508, 11509 and 11513 of the Government Code), and I  
7 willingly, intelligently and voluntarily waive those rights,  
8 including the right of requiring the Commissioner to prove the  
9 allegations in the Accusation at a hearing at which I would  
10 have the right to cross-examine witnesses against me and to  
11 present evidence in defense and mitigation of the charges.  
12

13 Respondent can signify acceptance and approval of the  
14 terms and conditions of this Stipulation and Agreement by faxing  
15 a copy of its signature page, as actually signed by Respondent,  
16 to the Department at the following fax number (213) 576-6917.  
17 Respondent agrees, acknowledges and understands that by  
18 electronically sending to the Department a fax copy of his actual  
19 signature as it appears on the Stipulation, that receipt of the  
20 faxed copy by the Department shall be as binding on Respondent as  
21 if the Department had received the original signed Stipulation  
22 and Agreement.

23 DATED: 3/24/03

  
\_\_\_\_\_  
PAUL CAMPOS  
Respondent

25 DATED: 3/24/03

  
\_\_\_\_\_  
HAROLD R. STOKES, ESQ.  
Counsel for Respondent

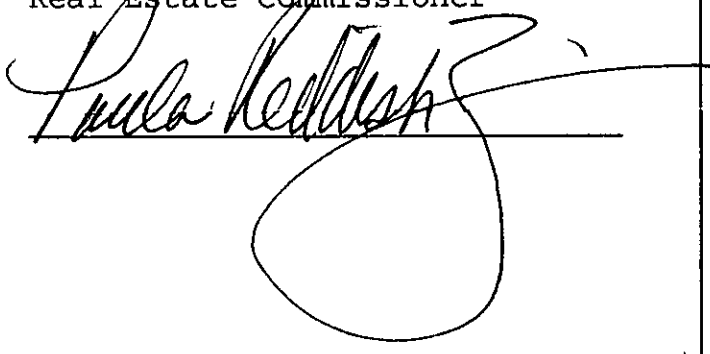
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\* \* \*

The foregoing Stipulation and Agreement is hereby  
adopted as my Decision in this matter and shall become  
effective at 12 o'clock noon on May 29, 2003.

IT IS SO ORDERED May 5, 2003.

PAULA REDDISH ZINNEMANN  
Real Estate Commissioner



A large, stylized handwritten signature in cursive script, appearing to read 'Paula Reddish Zinnemann', is written over a horizontal line. The signature is highly fluid and extends significantly to the right of the line.





1 MARTHA J. ROSETT, Counsel (SBN 142072)  
2 Department of Real Estate  
3 320 West Fourth St., #350  
4 Los Angeles, CA 90013-1105

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5 (213) 576-6914

**FILED**  
JAN - 9 2003  
DEPARTMENT OF REAL ESTATE

By \_\_\_\_\_

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \* \*

11 In the Matter of the Accusation of ) No. H-29871 LA  
12 )  
12 PAUL CAMPOS, ) A C C U S A T I O N  
13 )  
13 Respondent. )  
14 \_\_\_\_\_ )

15 The Complainant, Maria Suarez, a Deputy Real Estate  
16 Commissioner of the State of California, for cause of Accusation  
17 against PAUL CAMPOS (hereinafter "Respondent") is informed and  
18 alleges as follows:

19 1.

20 The Complainant, Maria Suarez, a Deputy Real Estate  
21 Commissioner of the State of California, makes this Accusation in  
22 her official capacity.

23 2.

24 At all times herein mentioned, Respondent was and still  
25 is licensed and/or has license rights under the Real Estate Law  
26 (Part 1 of Division 4 of the Business and Professions Code,  
27

1 hereinafter "Code"). At all times mentioned herein, Respondent  
2 was licensed as a real estate salesperson. Respondent was first  
3 licensed by the Department on or about November 16, 1998.

4 3.

5 On or about January 14, 2002, Respondent made  
6 application to the Department of Real Estate of the State of  
7 California (hereinafter "Department") for a real estate broker  
8 license.

9 4.

10 In response to Question 20 on that application, to wit,  
11 "Have you ever been convicted of any violation of law?...",  
12 Respondent answered, "No".

13 5.

14 On or about July 29, 1996, in the North Orange County  
15 Municipal Court, State of California, in case number 96NM05689,  
16 Respondent was convicted on his plea of guilty to one count of  
17 violating Penal Code Section 594(a)(1) (graffiti), a crime of  
18 moral turpitude which is substantially related to the  
19 qualifications, functions and duties of a real estate licensee  
20 pursuant to Title 10, Chapter 6 of the California Code of  
21 Regulations, Regulation 2910(a)(8).

22 6.

23 On or about October 23, 1997, in the Municipal Court,  
24 North Orange County Judicial District, State of California, in  
25 case number AN97NM05735, Respondent was convicted of violating  
26 Penal Code Section 242 (unlawful and intentional use of force and  
27 violence upon the person of another), a crime of moral turpitude

1 which is substantially related to the qualifications, functions  
2 and duties of a real estate licensee.

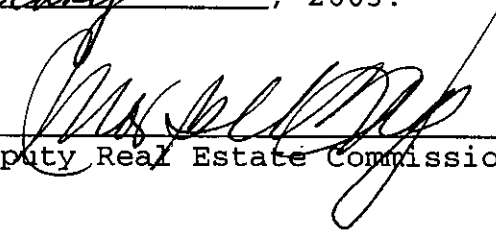
3 7.

4 Respondent's failure to disclose the convictions set  
5 forth in Paragraphs 5 and 6 above constitutes an attempt to  
6 procure a real estate license by misrepresentation or by making a  
7 material misstatement of fact in an application for a real estate  
8 license, and is grounds to suspend or revoke Respondent's real  
9 estate license pursuant to Code Sections 10177(a) and 10177(f).

10 WHEREFORE, the Complainant prays that a hearing be  
11 conducted on the allegations of this Accusation and that upon  
12 proof thereof, a decision be rendered imposing disciplinary  
13 action against all licenses and/or license rights of Respondent  
14 PAUL CAMPOS under the Real Estate Law and for such other and  
15 further relief as may be proper under applicable provisions of  
16 law.

17 Dated at Los Angeles, California

18 this 24<sup>th</sup> day of January, 2003.

19  
20   
21 Deputy Real Estate Commissioner  
22

23  
24 cc: Paul Campos  
25 Anthony Donald Perkins  
26 Sacto.  
27 Maria Suarez  
RJ  
NFS Loans, Inc.  
OAH