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DIANE LEE, Counsel (SBN 247222)
Department of Real Estate
320 West 4th Street, Suite 350
Los Angeles, California 90013

Telephone: (213) 576-6982
(Direct) (213) 576-6907

FILED

FEB - 7 2012

DEPARTMENT OF REAL ESTATE
BY: *R. Hernandez*

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)	No. H- 37836 LA
))
LILY GHILARDI JAGER,)	<u>A C C U S A T I O N</u>
))
Respondent.))
))

The Complainant, Robin Trujillo, a Deputy Real Estate Commissioner of the State of California for cause of Accusation against LILY GHILARDI JAGER ("Respondent") alleges as follows:

1.

The Complainant, Robin Trujillo, a Deputy Real Estate Commissioner of the State of California, makes this Accusation in her official capacity.

2.

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

1 17, 2011, Respondent's restricted real estate salesperson
2 license was suspended for failing to meet certain terms,
3 conditions, and restrictions as stated in Paragraph 4, herein.

4 3.

5 On July 21, 2005, the Real Estate Commissioner
6 approved the Stipulation and Agreement as his Decision in
7 Department Case No. H-31828 LA. The Decision granted a
8 restricted real estate salesperson license subject to terms,
9 conditions, and restrictions.

10 4.

11 Included in said terms, conditions, and restrictions
12 were the following:

13
14 6. During the term of any restricted license,
15 Respondent shall submit to the Department of Real
16 Estate as of the last day of each March, June,
17 September and December, proof satisfactory to the
18 Real Estate Commissioner of Respondent's ongoing
19 participation in a recognized alcohol diversion
20 program. Said proof shall be submitted to the
21 Manager of the Crisis Response Team at the Los
22 Angeles Office of the Department of Real Estate and
23 shall be verified as true and accurate by Respondent
24 under penalty of perjury.

25 The Commissioner may suspend the restricted
26 license issued to Respondent pending a hearing held
27 in accordance with Section 11500 et seq., of the
Government Code, if such proof is not timely
submitted as provided for herein, or as provided for
in a subsequent agreement between the Respondent and
the Commissioner. The suspension shall remain in
effect until such proof is submitted or until
Respondent enters into an agreement satisfactory to
the Commissioner to provide such proof, or until a
decision providing otherwise is adopted following a
hearing held pursuant to this condition.

1 5.

2 Respondent was issued a restricted real estate
3 salesperson license on August 22, 2005, but failed to provide a
4 report of participation in a recognized alcohol diversion
5 program for the quarters ending September and December 2009;
6 March, June, September, and December 2010; and March and June
7 2011.

8 6.

9 The facts set forth above are grounds for suspension
10 or revocation of Respondent's restricted real estate license and
11 all license rights under California Business and Professions
12 Code Section 10177(k).

13 WHEREFORE, Complainant prays that a hearing be
14 conducted on the allegations of this Accusation and that upon
15 proof thereof, a decision be rendered imposing disciplinary
16 action against all licenses and/or license rights of Respondent,
17 LILY GHILARDI JAGER, and for such other and further relief as
18 may be proper under applicable provisions of law.

19 Dated at Los Angeles, California: January 26 2012.

20
21 
22 _____
23 Robin Trujillo
24 Deputy Real Estate Commissioner

25 CC: LILY GHILARDI JAGER
26 Robin Trujillo
27 Sacto.