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FILED

AUG 23 2012

DEPARTMENT OF REAL ESTATE

BY: *[Signature]*

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BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

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|---------------------------------------|----------------------------|
| In the Matter of the Application of) | No. H-38371 LA |
| ANTHONY TODD STEFANI,) | <u>STATEMENT OF ISSUES</u> |
| Respondent.) | |

The Complainant, Robin Trujillo, a Deputy Real Estate Commissioner of the State of California, for Statement of Issues against ANTHONY TODD STEFANI, a.k.a. Tony Stefani ("Respondent"), alleges as follows:

1.

The Complainant makes this Statement of Issues against Respondent in her official capacity as a Deputy Real Estate Commissioner of the State of California.

2.

On or about May 31, 2011, Respondent made application to the Department of Real Estate of the State of California for a real estate salesperson license.

3.

Respondent was previously licensed by the Department

1 of Real Estate as a real estate broker on or about August 19,
2 2004. Respondent's real estate broker license expired on August
3 18, 2008.

4 4.

5 On or about October 15, 2007, in the United States
6 District Court for the Central District of California, Case No.
7 SACR 04-00068(A)-JVS, Respondent was convicted of violating
8 United States Code Sections Title 18 U.S.C. 371(conspiracy) and
9 Title 26 U.S.C. 7206(2) (aiding and assisting in the preparation
10 of false tax returns), both felonies. Respondent was sentenced
11 to 27 months in prison and ordered to pay a special assessment
12 in the amount of \$400.00.

13 5.

14 These crimes, by their facts and circumstances, bear a
15 substantial relationship under Section 2910, Title 10, Chapter
16 6, California Code of Regulations, to the qualifications,
17 functions or duties of a real estate licensee.

18 6.

19 The crimes of which Respondent was convicted
20 constitute cause for denial of Respondent's application for a
21 real estate license under Business and Professions Code Sections
22 475(a)(2), 480(a), and 10177(b).

23 These proceedings are brought under the provisions of
24 Section 10100, Division 4 of the Business and Professions Code
25 of the State of California and Sections 11500 through 11528 of
26 the California Government Code.

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1 WHEREFORE, the Complainant prays that the above-
2 entitled matter be set for hearing and, upon proof of the
3 charges contained herein, that the Commissioner refuse to
4 authorize the issuance of, and deny the issuance of, a real
5 estate salesperson license to Respondent, ANTHONY TODD STEFANI,
6 and for such other and further relief as may be proper under
7 other applicable provisions of law.

8 Dated at Los Angeles, California

9 this 22 day of August, 2012.

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13 Robin Trujillo

14 Deputy Real Estate Commissioner
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24 CC: ANTHONY TODD STEFANI
25 Robin Trujillo
26 Sacto.
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