1	STEVE CHU, Counsel (SBN 238155)	FILES
2	Department of Real Estate 320 West 4th Street, Suite 350	FILED
3	Los Angeles, California 90013-1105	JUL 29 2020
4	Telephone: (213) 620-6430	DEPT. OF REAL ESTATE  By Am Armil
5	Fax: (213) 576-6917	By Charles
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8		
9	BEFORE THE DEPARTMENT OF REAL ESTATE	
10	STATE OF CALIFORNIA	
11	***	
12	In the Matter of the Accusation of	) No. H-41743 LA
13	SEDRICK CELESTIN and,	) <u>ACCUSATION</u>
14	ANGELITA V CRISPO	)
15	Respondents.	ý
16		)
17	The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the	
18	State of California, for cause of Accusation against SEDRICK CELESTIN and ANGELITA V	
19	CRISPO ("Respondents"), is informed and alleges as follows:	
20		1.
21	The Complainant, Veronica Kilpatrick, acting in her official capacity as a	
22	Supervising Special Investigator of the State of California, makes this Accusation against	
23	SEDRICK CELESTIN and ANGELITA V CRISPO.	
24	2.	
25	All references to the "Code" are to the California Business and Professions Code	
26	and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.	
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LICENSE	HISTORY
	TITOTOIL

3.

Respondent SEDRICK CELESTIN ("CELESTIN") presently has license rights under the Real Estate Law, Part 1 of Division 4 of the Code, as a real estate broker. CELESTIN did business as So Cal Signature Homes from August 13, 2010, to March 21, 2019.

4.

Respondent ANGELITA V CRISPO ("CRISPO") presently has license rights as a real estate salesperson.

5.

From September 26, 2010, through August 28, 2018, Respondent CRISPO was affiliated with responsible broker Eduardo Talavera Ibanez. From August 29, 2018, through October 4, 2018, CRISPO was affiliated with responsible broker Gilmer K Pozo. From October 5, 2018, through the present, CRISPO has no broker affiliation. CRISPO has never been affiliated with responsible broker Respondent CELESTIN.

#### PURCHASE OF OCEANSIDE HOUSE

6.

On or about July 21, 2017, buyers A. Salibo and M. Salibo, represented by broker Respondent CELESTIN through salesperson Respondent CRISPO, submitted a Residential Purchase Agreement and Joint Escrow Instructions to purchase real property at 3588 Turquoise Lane, Oceanside, CA 92056 ("Oceanside house"). CRISPO signed on behalf of CELESTIN on the Possible Representation of More Than One Buyer or Seller form.

7.

On or about July 24, 2017, Respondent CELESTIN signed the Commission Authorization in the amount of \$9,875.00 to be paid as commission to CELESTIN for the purchase of the Oceanside house.

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On or about August 3, 2017, Respondents CELESTIN and CRISPO signed an Additional Agent Acknowledgement that stated, "The licensees below have entered into a separate written agreement to share responsibility and compensation for certain real estate licensed activity and have informed Broker of, or given Broker a copy of, that separate written agreement."

9.

On or about September 20, 2017, the purchase of the Oceanside house closed.

10.

On or about September 20, 2017, escrow provided Respondent CELESTIN with a commission check in the amount of \$9,875.00 for the purchase of the Oceanside house.

11.

On or about September 21, 2017, Respondent CELESTIN deposited the commission check in the amount of \$9,875.00 for the purchase of the Oceanside house.

#### UNPAID LOAN

12.

On or about November 1, 2016, Respondent CRISPO borrowed \$20,000 from buyer M. Salibo, and CRISPO promised in writing to repay the loan at 10% interest on November 1, 2017, in the total amount of \$22,000. CRISPO has not repaid M. Salibo.

### INVESTIGATION OF MAIN OFFICE ADDRESS

13.

From April 14, 2015, to March 21, 2019, the main office address maintained by Respondent CELESTIN with the Department of Real Estate was 1101 California Avenue #100, Corona, CA 92881.

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On or about January 20, 2020, a Department of Real Estate investigation revealed that Respondent CELESTIN had been evicted from 1101 California Avenue #100, Corona, CA 92881 on or about December 6, 2018.

### **FIRST CAUSE OF ACTION**

EMPLOYMENT OF SALESPERSON BY BROKER OTHER THAN BROKER OF RECORD

15.

The conduct, acts, or omissions of Respondents CELESTIN and CRISPO as described in Paragraphs 6 through 11 above, are in violation of Code sections 10137 and 10161.8 and Regulations sections 2726 and 2752, and constitute cause under Code sections 10137, 10165, 10176(a), 10176(i), 10177(d), 10177(g), and/or 10177(j) for the suspension or revocation of all the licenses, license endorsements, and license rights of CELESTIN and CRISPO.

# SECOND CAUSE OF ACTION

#### FRAUD AND DISHONEST DEALING

16.

The conduct, acts, or omissions of Respondent CRISPO as described in Paragraph 12 above, are in violation of Code sections 10162 and 10177(j), and constitute cause under Code sections 10176(i) and 10177(j) for the suspension or revocation of all the licenses, license endorsements, and license rights of CRISPO.

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### **THIRD CAUSE OF ACTION**

# FAILURE TO INFORM COMMISSIONER OF NEW ADDRESS

17.

The conduct, acts, or omissions of Respondent CELESTIN as described in Paragraphs 13 and 14 above, are in violation of Code sections 10162 and Regulations section 2715, and constitute cause under Code sections 10165, 10177(d), and/or 10177(g) for the suspension or revocation of all the licenses, license endorsements, and license rights of CELESTIN.

18.

Code section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department of Real Estate, the Commissioner may request the administrative law judge to direct a licensee found to have committed a violation of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all the licenses, license endorsements, and license rights of Respondents SEDRICK CELESTIN and ANGELITA V CRISPO under the Real Estate Law, for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at San Diego, California

this 30 day of 400,  $202\hat{\epsilon}$ 

Veronica Kilpatrick

Supervising Special Investigator

cc:

SEDRICK CELESTIN ANGELITA V CRISPO Veronica Kilpatrick Sacto.