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1	DEPARTMENT OF REAL ESTATE	FILED		
2	320 West 4th Street, Suite 350 Los Angeles, California 90013-1105	OCT 1 3 2021		
3	Telephone: (213) 620-2072	DEPT, OF REAL ESTATE		
4		By EAAAAAB		
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8	BEFORE THE DEPARTMEN	JT OF REAL FOTATE		
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10	STATE OF CAL	IFORNIA		
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	In the Matter of the Accusation against	DRE No. H-41911 LA OAH No. 2021070690		
12	STANDING STONE REAL ESTATE, INC., SUSAN A. RAMOS, individually and as	STIPULATION AND		
13	designated officer for Standing Stone Real Estate, Inc., and JESIKAH DANIELLE	AGREEMENT IN SETTLEMENT AND ORDER		
14	ALVARADO,			
15	Respondents.			
16	It is hereby stipulated by and between Respo	ndente Standing Stans De-1 Det-to Jun		
17				
18	Susan A. Ramos, and Jesikah Danielle Alvarado (co			
19	are represented by attorney Timothy S. Camarena, E			
20	through Lissete Garcia, Counsel for the Department of Real Estate ("Department"), as follows for the purpose of settling and disposing the Accusation filed on June 9, 2021, with Department			
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22	Case No. H-41911 LA ("Accusation") in this matter. 1. All issues which were to be contested			
	1. An issues which were to be contested	and all evidence which was to be presente		
23	by Complainant and Desmandants of C. 13	by Complainant and Respondents at a formal hearing on the Accusation, which hearing was to b		
23 24	by Complainant and Respondents at a formal hearing	g on the Accusation, which hearing was to		
	by Complainant and Respondents at a formal hearing	g on the Accusation, which hearing was to Stipulation and Agreemed H-41911 L		

held in accordance with the provisions of the Administrative Procedure Act ("APA"), shall instead and in place thereof be submitted on the basis of the provisions of this Stipulation and Agreement in Settlement and Order ("Stipulation").

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

3. 6 Respondents filed a Notice of Defense pursuant to Section 11506 of the 7 Government Code for the purpose of requesting a hearing on the allegations in the Accusation. 8 Respondents hereby freely and voluntarily withdraw said Notice of Defense. Respondents 9 acknowledge and understand that by withdrawing said Notice of Defense, Respondents will 10 thereby waive Respondents' rights to require the Real Estate Commissioner ("Commissioner") to 11 prove the allegations in the Accusation at a contested hearing held in accordance with the 12 provisions of the APA and that Respondents will waive other rights afforded to Respondents in 13 connection with the hearing such as the right to present evidence in defense of the allegations in 14 the Accusation and the right to cross-examine witnesses.

4. This Stipulation is based on the factual allegations contained in the Accusation
filed in this proceeding. In the interest of expedience 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 disciplinary action stipulated to
herein. The Real Estate Commissioner shall not be required to provide further evidence to prove
such allegations.

5. This Stipulation and Respondents' decision not to contest the Accusation are
made for the purpose of reaching an agreed disposition of this proceeding and are expressly
limited to this proceeding and any other proceeding or case in which the Department, or another
licensing agency of this state, another state or if the federal government is involved and

otherwise shall not be admissible in any other criminal or civil proceedings. 1 2 6. It is understood by the parties that the Real Estate Commissioner may adopt the Stipulation and Agreement as the Commissioner's Decision in this matter, thereby imposing the 3 4 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 his discretion does not adopt the 5 6 Stipulation and Agreement, it shall be void and of no effect, and Respondents shall retain the 7 right to a hearing and proceeding on the Accusation under all the provisions of the APA and 8 shall not be bound by any admission or waiver made herein. 9 7. The Order or any subsequent Order of the Real Estate Commissioner made 10 pursuant to this Stipulation and Agreement shall not constitute an estoppel, merger or bar to any 11 further administrative or civil proceedings by the Department of Real Estate with respect to any matters which were not specifically alleged to be causes for accusation in this proceeding. 12 13 DETERMINATION OF ISSUES 14 By reason of the foregoing stipulation and agreement and solely for the purpose of 15 settlement of the pending Accusation without a hearing, it is stipulated and agreed that the 16 following determination of issues shall be made: 17 I. 18 The conduct, acts and/or omissions of Respondent STANDING STONE REAL 19 ESTATE, INC. as set forth herein above in Paragraph 4, constitute cause for the suspension or 20 revocation of all real estate licenses and license rights of Respondent STANDING STONE 21 REAL ESTATE, INC. pursuant to the provisions of Business and Professions Code ("Code") section 10177, subdivision (g), for violation of Code sections 10137 and 10145, subdivision (c). 22 23 III24 111

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2	The conduct, acts and/or omissions of Respondent JESIKAH DANIELLE ALVARADO
3	as set forth herein above in Paragraph 4, constitute cause for the suspension or revocation of all
4	real estate licenses and license rights of Respondent JESIKAH DANIELLE ALVARADO
5	pursuant to the provisions of Code section 10176, subdivision (a), and Code section 10177,
6	subdivisions (d) and (g), for violation of Code sections 10137 and 10145, subdivision (c).
7	III.
8	The conduct, acts and/or omissions of Respondent SUSAN A. RAMOS as set forth
9	herein above in Paragraph 4, constitute cause for the suspension or revocation of all real estate
10	licenses and license rights of Respondent SUSAN A. RAMOS pursuant to the provisions of
11	Code section 10177, subdivision (h).
12	<u>ORDER</u>
13	I.
14	All licenses and license rights of Respondents STANDING STONE REAL ESTATE,
15	INC. and SUSAN A. RAMOS are hereby publicly reproved.
16	п.
17	All licenses and licensing rights of Respondents STANDING STONE REAL ESTATE,
18	INC. and SUSAN A. RAMOS shall indefinitely be suspended unless or until Respondents
19	STANDING STONE REAL ESTATE, INC. and SUSAN A. RAMOS pay, jointly or severally,
20	the sum of \$2,231.40 for one-half of the Commissioner's reasonable cost of the investigation
21	and enforcement which led to this disciplinary action. Said payment shall be in the form of a
22	cashier's check made payable to the Department of Real Estate. The investigative and
23	enforcement costs must be delivered to the Department of Real Estate, Flag Section at
24	P.O. Box 137013, Sacramento, CA 95813-7013, prior to the effective date of this Decision
	Stinulation and Agreement

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ilation and Agreement H-41911 LA and Order. Payment of investigation and enforcement costs <u>should not be made</u> until the
 Stipulation has been approved by the Commissioner.

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III.

4 All licenses and licensing rights of Respondent JESIKAH DANIELLE ALVARADO 5 under the Real Estate Law are revoked; provided, however, a restricted real estate salesperson 6 license shall be issued to Respondent JESIKAH DANIELLE ALVARADO pursuant to Section 7 10156.5 of the Code if Respondent makes application therefor and pays to the Department the 8 appropriate fee for the restricted license within 90 days from the effective date of this Decision 9 and Order. The restricted license issued to Respondent JESIKAH DANIELLE ALVARADO 10 shall be subject to all of the provisions of Section 10156.7 of the Code and to the following 11 limitations, conditions and restrictions imposed under authority of Section 10156.6 of that Code: 12 1. The restricted license issued to Respondent may be suspended prior to hearing by 13 Order of the Commissioner in the event of Respondent's conviction or plea of nolo 14 contendere to a crime which is substantially related to Respondent's fitness or capacity as 15 a real estate licensee. 16 2. The restricted license issued to Respondent may be suspended prior to hearing by 17 Order of the Real Estate Commissioner on evidence satisfactory to the Commissioner that 18 Respondent has violated provisions of the California Real Estate Law, the Subdivided 19 Lands Law, Regulations of the Real Estate Commissioner or conditions attaching to the 20 restricted license. 21 3. Respondent shall not be eligible to petition for the issuance of any unrestricted 22 real estate license nor for removal of any of the conditions, limitations or restrictions of a 23 restricted license until two (2) years have elapsed from the effective date of this Decision

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1	and Order. Respondent shall not be eligible to apply for any unrestricted licenses until all
2	restrictions attaching to the license have been removed.
3	4. Respondent shall submit with any application for license under an employing
4	broker, or any application for transfer to a new employing broker, a statement signed by
5	the prospective employing real estate broker on a form approved by the Department
6	which shall certify:
7	(a) That the employing broker has read the Decision and Order of the
8	Commissioner which granted the right to a restricted license; and
9	(b) That the employing broker will exercise close supervision over the
10	performance by the restricted licensee relating to activities for which a real
11	estate license is required.
12	5. All licenses and licensing rights of Respondent JESIKAH DANIELLE
13	ALVARADO are indefinitely suspended unless or until Respondent JESIKAH
14	DANIELLE ALVARADO pays the sum of \$2.231.40 for one-half of the Commissioner's
15	reasonable cost of the investigation and enforcement which led to this disciplinary action.
16	Said payment shall be in the form of a cashier's check made payable to the Department of
17	Real Estate. The investigative and enforcement costs must be delivered to the
18	Department of Real Estate, Flag Section at P.O. Box 137013, Sacramento, CA
19	95813-7013, prior to the effective date of this Decision and Order. Payment of
20	investigation and enforcement costs should not be made until the Stipulation has
21	been approved by the Commissioner.
22	6. Respondent JESIKAH DANIELLE ALVARADO shall, within sixty (60) days
23	from the effective date of this Decision and Order, provide proof satisfactory to the
24	Commissioner, of having paid the amount of \$1,000.00 as restitution to Nathaniel
	Stipulation and Agreement H-41911 LA
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1	Williams. Proof of satisfaction of this requirement includes: a certified copy of the
2	satisfaction of judgment; a letter from an attorney or certified public accountant
3	testifying under penalty of perjury to the fact that said judgment has been paid by
4	Respondent; a copy of a cancelled check to the victim(s); and/or a letter from the
5	victim(s) attesting that repayment of funds has been received. Proof of payment must
6	be delivered to the Department of Real Estate, Flag Section at P.O. Box 137013,
7	Sacramento, CA 95813-7013 or by fax at 916-263-8758, within sixty (60) days from
8	the effective date of this Decision and Order. A copy of the proof must also be
9	delivered to DRE Counsel Lissete Garcia, Attention: Legal Section, Department of
10	Real Estate, 320 W. Fourth St., Room 350, Los Angeles, California 90013-1105. If
11	Respondent fails to satisfy this condition in a timely manner as provided for herein,
12	Respondent's real estate license shall automatically be suspended until Respondent
13	complies with this condition, or until a decision providing otherwise is adopted
14	following a hearing held pursuant to this condition.
15	7. Respondent JESIKAH DANIELLE ALVARADO shall, within nine (9) months
16	from the effective date of this Decision and Order, present evidence satisfactory to the
17	Commissioner that Respondent has, since the most recent issuance of an original or
18	renewal real estate license, taken and successfully completed the continuing education
19	requirements of Article 2.5 of Chapter 3 of the Real Estate Law for renewal of a real
20	estate license. The continuing education courses must include the course on trust fund
21	accounting and handling specified in paragraph (3) of subdivision (a) of Section 10170.5
22	of the Business and Professions Code. Proof of satisfaction of these requirements
23	includes evidence that Respondent has successfully completed the trust fund account and
24	handling continuing education courses, no earlier than 120 days prior to the effective date

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-1-	of the Decision and Order in this matter. If Respondent JESIKAH DANIELLE
2	ALVARADO fails to satisfy this condition, Respondent's real estate license shall
3	automatically be suspended until Respondent presents evidence satisfactory to the
4	Commissioner of having taken and successfully completed the continuing education
5	requirements. Proof of completion of the continuing education courses must be
6	delivered to the Department of Real Estate, Flag Section at P.O. Box 137013,
7	Sacramento, CA 95813-7013.
8	8. Respondent shall, within twelve (12) months from the effective date of this
9	Decision and Order, take and pass the Professional Responsibility Examination
10	administered by the Department including the payment of the appropriate examination
11	fee. If Respondent fails to satisfy this condition, Respondent's real estate license shall
12	automatically be suspended until Respondent passes the examination.
13	***
14	DATED: <u>9/3/2021</u> Lissete Garcia, Counsel
15	Department of Real Estate
16	We have read this Stipulation and its terms are understood by us and are agreeable and
17	acceptable to us. We understand that we are waiving rights given to us by the California APA
18	(including, but not limited to, Sections 11506, 11508, 11509, and 11513 of the Government
19	Code), and we willingly, intelligently, and voluntarily waive those rights, including the right of
20	requiring the Commissioner to prove the allegations in the Accusation at a hearing at which we
21	would have the right to cross-examine witnesses against us and to present evidence in defense
22 23	and mitigation of the charges.
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~ '	Stipulation and Agreement
	H-41911 LA

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Respondents can signify acceptance and approval of the terms and conditions of this 1 Stipulation and Agreement by electronically e-mailing a copy of the signature page, as actually 2 3 signed by Respondents, to the Department. Respondents agree, acknowledge, and understand that by electronically sending to the Department an electronic copy of Respondents' actual 4 signatures, as they appear on the Stipulation, that receipt of the emailed copy by the Department 5 shall be as binding on Respondents as if the Department had received the original signed 6 7 Stipulation. By signing this Stipulation, Respondents understand and agree that Respondents 8 may not withdraw Respondents' agreement or seek to rescind the Stipulation prior to the time the Commissioner considers and acts upon it or prior to the effective date of the Stipulation and 9 10 Order. 11 MAILING Respondents and Respondents' counsel shall, within five (5) business days from signing 12 13 the Stipulation, mail the original signed signature page(s) of the Stipulation herein to Lizzete 14 Garcia, Attention: Legal Section, Department of Real Estate, 320 W. Fourth St., Room 350, Los 15 Angeles, California 90013-1105. 16 Respondents' signature below constitutes acceptance and approval of the terms and 17 conditions of this Stipulation. Respondents agree, acknowledge, and understand that by signing this Stipulation, Respondents are bound by its terms as of the date of such signature and that this 18 agreement is not subject to reacission or amondment at a later date except by a suparate Decision 19 20 and Order of the Real Estate Commissioner. 21 DATED: 22 By (Printed Name): 23 Brow Title: 24 Stipul tion and Agreemen H-41911 L/ 9

202 DATED: 1 ondent SUS MOS 2 3/2021 3 DATED: ondent JESIKAH DANIELLE ALVARADO 9/3/202 4 DATED ŝ Timothy S. Camirona, Esq., Counsel for Respondents 6 Approved as to Form 7 \* \* 8 The foregoing Stipulation and Agreement in Settlement and Order is hereby adopted by me as my Decision in this matter and shall become effective at 12 o'clock noon 9 02 10 00 3 10.1.21 11 IT IS SO ORDERED 12 13 REAL ESTATE COMMISSIONER. 14 Dough R. McCaulcy 15 16 17 18 19 20 21 22 23 24 Stipulation and Agreement H-41911 LA 10