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FILED

JAN 27 2022

DEPT. OF REAL ESTATE

By *Zhi J*

8
9 **BEFORE THE DEPARTMENT OF REAL ESTATE**

10 **STATE OF CALIFORNIA**

11 * * *

12 In the Matter of the Application of) No. H-42153 LA
13 STEPHEN PRINCIPE SEMPREVIVO,) STATEMENT OF ISSUES
14)
15 Respondent.)
16 _____)

17 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
18 of California, for Statement of Issues against STEPHEN PRINCIPE SEMPREVIVO
19 (“Respondent”) alleges as follows:

20 1.

21 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
22 of California, makes this Statement of Issues in her official capacity.

23 2.

24 All references to the “Code” are to the California Business and Professions Code
25 and all references to “Regulations” are to Title 10, Chapter 6, California Code of Regulations.

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STATEMENT OF ISSUES

1 3.

2 On or about September 25, 2020, Respondent made application to the
3 Department of Real Estate¹ ("Department") for a real estate salesperson license.

4 CAUSE FOR DISCIPLINE

5 (CRIMINAL CONVICTION)

6 4.

7 November 20, 2015; 18 United States Code ("U.S.C.") 1349 - Felony

8 a. On or about March 11, 2019, in the United State District Court for the District
9 of Massachusetts, in Case No. **19-6087-MPK**, United States of America v. Gregory Abbott et.
10 al., a felony complaint was filed against Respondent, among others, for violations of 18 U.S.C.
11 1349 (conspiracy to commit mail fraud and honest services mail fraud), a felony. On or about
12 April 8, 2019, in the United State District Court for the District of Massachusetts, in Case No.
13 **19-10117**, United States of America v. Gregory Abbott et. al., an information was filed against
14 Respondent, among others, for violations of 18 U.S.C. 1349 (conspiracy to commit mail fraud
15 and honest services mail fraud), a felony.

16 b. On or about April 7, 2019, Respondent pled guilty to and was convicted of
17 violation of 18 U.S.C. 1349 (conspiracy to commit mail fraud and honest services mail fraud), a
18 felony. On or about May 7, 2019, the plea was confirmed in court.

19 c. On or about October 2, 2019, the Court sentenced Respondent to, including, in
20 part, 4 months prison, 2 years supervised release, and payment of fines and fees.

21 5.

22 The crime of which Respondent was convicted, as set forth in Paragraph 4
23 above, by its facts and circumstances, bears a substantial relationship under Section 2910, Title
24 10, Chapter 6, California Code of Regulations to the qualifications, functions or duties of a real
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27 ¹ Between July 1, 2013 and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate under the Department of Consumer Affairs.

1 estate licensee and constitute cause under **Code Sections 490 and 10177(b)** for the suspension
2 or revocation of the license and license rights of Respondent under the Real Estate Law.

3 6.

4 These proceedings are brought under the provisions of Section 10100, Division
5 4 of the Business and Professions Code of the State of California and Sections 11500 through
6 11528 of the California Government Code.

7 P R A Y E R

8 WHEREFORE, the Complainant prays that the above-entitled matter be set for
9 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
10 authorize the issuance of, and deny the issuance of, a real estate salesperson license to
11 Respondent STEPHEN PRINCIPE SEMPREVIVO and for such other and further relief as may
12 be proper under other applicable provisions of law.

13
14 Dated at Los Angeles, California this 26th day of January, 2022.

15
16 
17 Maria Suarez
18 Supervising Special Investigator

19 cc: STEPHEN PRINCIPE SEMPREVIVO
20 Maria Suarez
21 Sacto.