

1 DEPARTMENT OF REAL ESTATE
2 P. O. Box 137007
3 Sacramento, CA 95813-7007

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FILED

DEC 10 2020

DEPARTMENT OF REAL ESTATE
By K. Krapp

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7
8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

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11
12 In the Matter of the Accusation of) BRE No. H-6849 SAC
13)
13 JRP REAL ESTATE & MORTGAGE,)
14 RAMANDEEP SINGH,)
14 and JASWANT SINGH PANNU,)
15) STIPULATION AND AGREEMENT
15 Respondents.) IN SETTLEMENT AND ORDER
16)

17 It is hereby stipulated by and between JRP REAL ESTATE & MORTGAGE
18 (JRP), and RAMANDEEP SINGH (SINGH), collectively Respondents, their counsel Shannon
19 B. Jones, and the Complainant, acting by and through Richard K. Uno, Counsel for the
20 Department of Real Estate; as follows for the purpose of settling and disposing of the
21 Accusation filed on July 1, 2019 in this matter as it pertains to JRP REAL ESTATE &
22 MORTGAGE and RAMANDEEP SINGH only.

23 1. All issues which were to be contested and all evidence which was to be
24 presented by Complainant and Respondents at a formal hearing on the Accusation, which
25 hearing was to be held in accordance with the provisions of the Administrative Procedure Act
26 ("APA"), shall instead and in place thereof be submitted solely on the basis of the provisions of
27 this Stipulation and Agreement In Settlement and Order.

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

4 3. Respondents filed a Notice of Defense pursuant to Section 11505 of the
5 Government Code for the purpose of requesting a hearing on the allegations in the Accusation.
6 Respondents hereby freely and voluntarily withdraw said Notices of Defense. Respondents
7 acknowledge that they understand that by withdrawing said Notices of Defense they will thereby
8 waive their right to require the Commissioner to prove the allegations in the Accusation at a
9 contested hearing held in accordance with the provisions of the APA and that they will waive
10 other rights afforded to them in connection with the hearing such as the right to present
11 evidence in defense of the allegations in the Accusation and the right to cross-examine witnesses.

12 4. This Stipulation and Agreement is based on the factual allegations contained in
13 the Accusation. In the interest of expediency and economy, Respondents choose not to contest
14 these factual allegations, but to remain silent and understand that, as a result thereof, these factual
15 statements will serve as a prima facie basis for the "Determination of Issues and "Order" set forth
16 below. The Commissioner shall not be required to provide further evidence to prove such
17 allegations.

18 5. This Stipulation and Agreement and Respondents' decision not to contest the
19 Accusation are made for the purpose of reaching an agreed disposition of this proceeding and is
20 expressly limited in this proceeding and any other proceeding or case in which the Department,
21 the State or Federal Government, any Agency of the State, or any Agency of another State is
22 involved, and shall not be admissible in any other criminal or civil proceeding.

23 6. Respondents agree to testify or to undertake reasonable efforts to make others
24 available at the hearing on the Accusation on file herein and to otherwise undertake reasonable
25 efforts to cooperate with DRE Counsel to affect such testimony. The Parties agree that
26 Respondents' obligation to undertake reasonable efforts to cooperate with DRE Counsel in
27 making witnesses available for hearing is in consideration of the Department's settlement offer.

1 a. JRP pays a monetary penalty pursuant to Section 10175.2 of the Business and
2 Professions Code at the rate of \$100.00 per day for thirty (30) days of the suspension for a total
3 monetary penalty of \$3,000.00.

4 b. Said payment shall be in the form of a cashier's check or certified check made
5 payable to the Department of Real Estate. Said check must be received by the Department of
6 Real Estate, Flag Section at P.O. Box 137013, Sacramento, CA 95813-7013, prior to the
7 effective date of this Order.

8 c. No further cause for disciplinary action against the real estate license of JRP
9 occurs within one year from the effective date of the Decision in this matter.

10 d. If JRP fails to pay the monetary penalty in accordance with the terms and
11 conditions of the Decision, the Commissioner may, without a hearing, order the immediate
12 execution of all or any part of the stayed suspension in which event JRP shall not be entitled to
13 any repayment nor credit, prorated or otherwise, for money paid to the Department under the
14 terms of this Decision.

15 e. If JRP pays the monetary penalty, and if no further cause for disciplinary
16 action against the real estate license of JRP occurs within two (2) years from the effective date
17 of the Decision, the stay hereby granted shall become permanent.

18 2. The remaining thirty (30) days of said suspension shall be stayed for two (2)
19 years upon the following terms and conditions:

20 a. JRP shall obey all laws, rules and regulations governing the rights, duties
21 and responsibilities of a real estate licensee in the State of California and;

22 b. That no final subsequent determination be made, after hearing or upon
23 stipulation, that cause for disciplinary action occurred within two (2) years from the effective
24 date of this Order. Should such a determination be made, the Commissioner may, in his
25 discretion, vacate and set aside the stay order and reimpose all or a portion of the stayed
26 suspension.

27

1 c. That JRP undertakes reasonable efforts to have SINGH available to testify at
2 the hearing on this matter now set for August 11 and 12, 2020, or any other dates, should this
3 matter be continued.

4 B. RAMANDEEP SINGH

5 1. The real estate broker license and license rights of Respondent
6 RAMANDEEP SINGH (SINGH), under the Real Estate Law are suspended for a period of
7 sixty (60) days from the effective date of this Order; provided, however, that if SINGH
8 petitions, thirty (30) days of said suspension shall be stayed upon condition that:

9 a. SINGH pays a monetary penalty pursuant to Section 10175.2 of the Business
10 and Professions Code at the rate of \$100.00 per day for thirty (30) days of the suspension for a
11 total monetary penalty of \$3,000.00.

12 b. Said payment shall be in the form of a cashier's check or certified check made
13 payable to the Department of Real Estate. Said check must be delivered to the Department of
14 Real Estate, Flag Section at P.O. Box 137013, Sacramento, CA 95813-7013, prior to the
15 effective date of this Order.

16 c. No further cause for disciplinary action against the real estate license of
17 SINGH occurs within two (2) years from the effective date of the Decision in this matter.

18 d. If SINGH fails to pay the monetary penalty in accordance with the terms and
19 conditions of the Decision, the Commissioner may, without a hearing, order the immediate
20 execution of all or any part of the stayed suspension in which event SINGH shall not be entitled
21 to any repayment nor credit, prorated or otherwise, for money paid to the Department under the
22 terms of this Decision.

23 e. If SINGH pays the monetary penalty, and if no further cause for disciplinary
24 action against the real estate license of Respondent occurs within two (2) years from the effective
25 date of the Decision, the stay hereby granted shall become permanent.

26 2. The remaining thirty (30) days of said suspension shall be stayed for two (2)
27 years upon the following terms and conditions:

1 a. SINGH shall obey all laws, rules and regulations governing the rights, duties
2 and responsibilities of a real estate licensee in the State of California, and,


3 b. That no final subsequent determination be made, after hearing or upon
4 stipulation, that cause for disciplinary action occurred within two (2) years from the effective
5 date of this Order. Should such a determination be made, the Commissioner may, in his
6 discretion, vacate and set aside the stay order and reimpose all or a portion of the stayed
7 suspension. Should no such determination be made, the stay imposed herein shall become
8 permanent.

9 c. That SINGH makes himself available to testify at the hearing on this matter,
10 now set for August 11 and 12, 2020, or any other dates, should this matter be continued.

11 JRP REAL ESTATE AND MORTGAGE AND RAMANDEEP SINGH

12 1. All licenses and licensing rights of Respondents are indefinitely suspended
13 unless or until Respondents pay the sum of \$4,911.95, which is one-half of the total of
14 \$9,823.90, for the Commissioner's reasonable cost of the investigation which led to this
15 disciplinary action. Said payment shall be in the form of a cashier's check made payable to the
16 Department of Real Estate. The investigative and enforcement costs must be delivered to the
17 Department of Real Estate, Flag Section at P.O. Box 137013, Sacramento, CA 95813-7013,
18 prior to the effective date of this Stipulation.

19
20
21
22 8/3/20
23 DATED



24 RICHARD K. UNO, Counsel
25 DEPARTMENT OF REAL ESTATE

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27 I have read the Stipulation and Agreement in Settlement and Order and its terms
are understood by me and are agreeable and acceptable to me. I understand that I am waiving
rights given to me by the California Administrative Procedure Act (including but not limited to

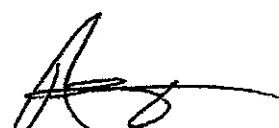
1 Sections 11506, 11508, 11509 and 11513 of the Government Code), and I willingly,
2 intelligently, and voluntarily waive those rights, including the right of requiring the
3 Commissioner to prove the allegations in the Accusation at a hearing at which I would have the
4 right to cross-examine witnesses against me and to present evidence in defense and mitigation
5 of the charges.

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7
8 7/2/2020
9 DATED


10 JRP REAL ESTATE & MORTGAGE
11 Respondent
12 By RAMANDEEP SINGH,
13 Designated Officer

14 ***

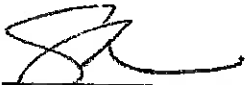
15
16
17 7/2/2020
18 DATED


19 RAMANDEEP SINGH
20 Respondent

21 ***

22 *I have reviewed this Stipulation and Agreement as to form and content and have
23 advised my clients accordingly.*

24
25
26 July 31, 2020
27 DATED


28 SHANNON B. JONES
29 Attorney For Respondents

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31 The foregoing Stipulation and Agreement In Settlement and Order is hereby
32 adopted by the Real Estate Commissioner as his Decision and Order and shall become
33 effective at 12 o'clock noon on DEC 31 2020

34 IT IS SO ORDERED 9.25.20

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DOUGLAS R. McCAULEY
REAL ESTATE COMMISSIONER

Douglas R. McCauley