CHERYL D. KEILY, Counsel (SBN 94008) Department of Real Estate 2 320 West 4th Street, Suite 350 Los Angeles, California 90013-1105 3 SEP 0 6 2011 Telephone: (213) 576-6982 4 (213) 576-6905 (Direct) DEPARTMENT OF REAL 5 6 7 8 BEFORE THE DEPARTMENT OF REAL ESTATE 9 STATE OF CALIFORNIA 10 11 In the Matter of the Accusation of No. H-37502 LA 12 JENELLE KRISTIN TOLLEFSON,  $\underline{A} \ \underline{C} \ \underline{C} \ \underline{U} \ \underline{S} \ \underline{A} \ \underline{T} \ \underline{I} \ \underline{O} \ \underline{N}$ 13 Respondent. 14 15 The Complainant, Joseph Aiu, a Deputy Real Estate 16 Commissioner of the State of California, for cause of Accusation 17 against JENELLE KRISTIN TOLLEFSON, ("Respondent") alleges as 18 follows: 19 20 1. 21 The Complainant, Joseph Aiu, a Deputy Real Estate 22 Commissioner of the State of California, makes this Accusation 23 in his official capacity. 24 2. 25 Respondent is presently licensed and/or has license 26 rights under the Real Estate Law, Part 1 of Division 4 of the

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Business and Professions Code (Code) as a real estate salesperson.

3.

## (LICENSE DISCIPLINE)

On or about September 2, 2009, pursuant to the stipulation of Respondent in Case Nos. C 061109-03 and C 070302-06, the Director of the Office of Real Estate Appraisers ("OREA") revoked the Real Estate Appraiser License of Respondent. However, the foregoing revocation was stayed and Respondent was placed on probation for a period of three years on terms and conditions stated in the Decision. The accusation filed against Respondent charged Respondent with numerous instances of preparing a fraudulent appraisal report by virtue of certifying that she had inspected particular properties when she had not done so. Section 3721(a)(6) of Title 10, Chapter 6.5 of the California Code of Regulations ("Regulations") makes a violation of any provision of the Uniform Standards of Professional Appraisal Practice ("USPAP") grounds for license discipline. Respondent was disciplined pursuant to the provisions of the following sections of the OREA Regulations: Section 3721(a)(6) [violation of any provision of the USPAP]; Section 3721(a)(2) [doing any act involving dishonesty, fraud or deceit with the intent to benefit himself or another, or to injure another]; and Section 3721(a)(4) [doing any act which if done by the holder of a license to practice real estate

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appraisal would be grounds for revocation or suspension of such license].

4.

The acts resulting in the disciplinary action taken with respect to Respondent's real estate appraisal license, as alleged herein above in Paragraph 3, constitute cause under Sections 480(a)(3) and/or 10177(f) of the Code for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

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 and license rights of Respondent, JENELLE KRISTIN TOLLEFSON, under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code) and for such other and further relief as may be proper under other applicable provisions of law.

Dated at San Diego, California

this \_\_\_\_ day of hugh, 2011.

CC:

Deputy Real Estate Commissioner

JENELLE KRISTIN TOLLEFSON
TNG Real Estate Consultants Inc.
Joseph Aiu
Sacto.