



1 RESPONDENT'S LICENSE HISTORY

2 3.

3 a. Respondent is presently licensed and/or has license rights under the Code, as  
4 a real estate salesperson with Department of Real Estate ("Department") license number  
5 01324028. Respondent was originally issued a restricted salesperson license from on or about  
6 April 16, 2012 to February 4, 2016, and then was licensed with a plenary salesperson license  
7 from on or about February 5, 2016 through the present.

8 b. Respondent currently holds a Mortgage Loan Originator ("MLO") license  
9 endorsement with the Department with the assigned National Mortgage Licensing System and  
10 Registry ("NMLS") number 325149. Respondent's MLO license endorsement was originally  
11 issued on or about February 17, 2016. From on or about February 17, 2016 through the present,  
12 Respondent has been authorized to represent World Wide Credit Corporation with Department  
13 license number 01129574 and NMLS number 242502.

14  
15 STATEMENT OF FACTS

16 4.

17 Respondent is currently, and at the time of the violations described herein, was  
18 employed by and authorized to represent World Wide Credit Corporation, a mortgage  
19 company, with Department license number 01129574 and NMLS number 242502.

20 5.

21 Respondent violated the NMLS student Rules of Conduct ("ROC") by using the  
22 services of Danny Yen dba Real Estate Educational Services ("REES") to complete her NMLS-  
23 approved continuing education ("CE") courses, which constitutes a violation of the licensing  
24 requirements of this state and under federal law. Specifically, Respondent used and  
25 compensated REES to obtain credit through an in-person fraud scheme. Under the in-person  
26 fraud scheme, Respondent used REES to annually report completion of an in-person course for  
27 four years from 2017 to 2020. However, REES did not teach the in-person courses, and

1 Respondent neither attended any in-person course nor completed the required exam or course  
2 work to receive course credit.

3  
4 NMLS Pre-Licensing and Continuing Education

5 6.

6 The State Regulatory Registry LLC (“SRR”), which owns and operates the  
7 NMLS, administers pre-licensing education (“PE”), CE, and Uniform State Test protocols.  
8 Title V of Public Law 110-289, the Secure and Fair Enforcement for Mortgage Licensing Act  
9 of 2008 (the “SAFE Act”), requires that state-licensed MLOs complete PE prior to initial  
10 licensure and annual CE thereafter. (See Code section 10166.06.)

11 7.

12 In order to meet PE requirements contemplated under the SAFE Act, state-  
13 licensed MLOs must complete twenty (20) hours of NMLS–approved education. (Code section  
14 10166.06(a).)

15 8.

16 In order to meet CE requirements contemplated under the SAFE Act, state-  
17 licensed MLOs must complete eight (8) hours of NMLS–approved education. (Code section  
18 10166.10(a).)

19  
20 REES

21 9.

22 REES, with NMLS course provider number 1405046, was an NMLS–approved  
23 course provider during the years 2017 to 2020.

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10.

The NMLS had approved REES to offer one in-person 8-hour “DBO-SAFE Act Comprehensive: Mortgage Continuing Education” course in a classroom format located at 15751 Brookhurst Street, Suite 230, Westminster, CA 92683 (“Westminster address”).

11.

REES was never approved by the NMLS to offer online PE or CE to MLOs.

12.

During all times relevant herein, REES had its primary place of business located at 3643 Adams Street, Carlsbad, California.

REES Investigation

13.

The Mortgage Testing and Education Board (“MTEB”), which was created by SRR, has approved “Administrative Action Procedures for S.A.F.E. Testing and Education Requirements” (“AAP”), which extends administrative authority to the MTEB to investigate alleged violations of the NMLS student Rules of Conduct (“ROC”).

14.

The AAP also extends administrative authority to the MTEB and SRR to investigate alleged violations of the NMLS Standards of Conduct (“SOC”), which apply to all NMLS–Approved course providers.

15.

In late 2020, SRR obtained information concerning suspicious activity and that that information identified a possible MLO education cheating scheme coordinated by and implemented through REES and its owners and operators, including Danny Yen. Based on that information, and pursuant to the AAP, SRR initiated an investigation into the matter.

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1 Findings of SRR and Department Investigation

2 16.

3 On or about December 15, 2020, SRR staff were informed of suspected  
4 individuals completing online NMLS-approved education courses on behalf of another.

5 17.

6 Additional investigation revealed evidence that REES fraudulently provided  
7 course credit to MLOs who had never attended and completed REES' 8-hour in-person CE  
8 course in Westminster, California in the in-person fraud scheme.

9 18.

10 Respondent was identified in NMLS records as receiving course credit for  
11 REES' 8-hour in-person CE course in 2017, 2018, 2019, and 2020. It was determined that none  
12 of these in-person courses ever took place, and Respondent never attended an in-person course  
13 corresponding to the course credits Respondent received. Consequently, Respondent never took  
14 a knowledge examination required for course credit. It was determined that Respondent had  
15 used REES to obtain four years of course credits from 2017 to 2020 in violation of the ROC  
16 under the in-person fraud scheme.

17 19.

18 The ROC provide in relevant part:

19 ROC 4: I will not divulge my login ID or password or other login credential(s)  
20 to another individual for any online course.

21 ROC 5: I will not seek or attempt to seek outside assistance to complete the  
22 course.

23 ROC 8: I will not engage in any capacity that would be contrary to good  
24 character or reputation, or engage in any behavior that would cause the public to believe that I  
25 would not operate in the mortgage loan business lawfully, honestly or fairly.

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1 ROC 9: I will not engage in any conduct that is dishonest, fraudulent, or would  
2 adversely impact the integrity of the course(s) I am completing and the conditions for which I  
3 am seeking licensure or renewal of licensure.

4 20.

5 By using the services of another to complete his CE and receiving fraudulent  
6 course credits through a non-existent course, Respondent violated ROC 4, 5, and 9, and  
7 engaged in conduct that was dishonest, fraudulent, and that adversely impacted the integrity of  
8 the courses and the conditions and qualifications for which Respondent sought licensure or  
9 renewal of licensure.

10  
11 Voluntary Survey and Interview

12 21.

13 In August 2021, Respondent was provided an opportunity via a survey to  
14 disclose information about her participation in the REES online PE and CE education fraud. On  
15 or about August 18, 2021, Respondent responded to the survey request. In response to the  
16 survey, Respondent stated, in part, that that he did not attend in person the CA-DBO SAFE  
17 Comprehensive courses in which he was enrolled in in 2019 and 2020.

18  
19 Financial Responsibility, Character, and General Fitness

20 22.

21 Pursuant to Code section 10166.05(c), the Commissioner must deny a MLO  
22 license endorsement if the licensee fails to meet the minimum criteria for licensure, which  
23 includes a requirement that the applicant “has demonstrated such financial responsibility,  
24 character and general fitness as to command the confidence of the community and to warrant a  
25 determination that the [MLO] will operate honestly, fairly, and efficiently within the purposes  
26 of this division.”

27 ///



1 hereunder.

2 (b) Deny, suspend, revoke, condition, or decline to renew a mortgage loan  
3 originator license endorsement, if an application or endorsement holder fails at any time to  
4 meet the requirements of Section 10166.05 or 10166.09, or withholds information or makes a  
5 material misstatement in an application for a license endorsement or license endorsement  
6 renewal.”

7 27.

8 Code section 10177 provides in pertinent part, “[t]he Commissioner may  
9 suspend or revoke the license of a real estate licensee, delay the renewal of a license of a real  
10 estate licensee, or deny the issuance of a license to an applicant, who has done any of the  
11 following...

12 ...

13 (d) Willfully disregarded or violated the Real Estate Law (Part 1 (commencing  
14 with Section 10000)) or Chapter 1 (commencing with Section 11000) of Part 2 or the rules and  
15 regulations of the commissioner for the administration and enforcement of the Real Estate Law  
16 and Chapter 1 (commencing with Section 11000) of Part 2.

17 ...

18 (g) Demonstrated negligence or incompetence in performing an act for which  
19 the officer, director, or person is required to hold a license.

20 ...

21 (j) Engaged in any other conduct, whether of the same or of a different character  
22 than specified in this section, that constitutes fraud or dishonest dealing.

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1 COSTS

2 (INVESTIGATION AND ENFORCEMENT COSTS)

3 28.

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

9 WHEREFORE, Complainant prays that a hearing be conducted on the  
10 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing  
11 disciplinary action against the license(s), MLO endorsement, and/or license rights of  
12 Respondent WILLIAM ELADIN FLORES under the Real Estate Law, for the costs of  
13 investigation and enforcement as permitted by law and for such other and further relief as may  
14 be proper under other applicable provisions of law.

15 Dated at San Diego, California: November 2, 2022.

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17  
18 Veronica Kilpatrick

19 Veronica Kilpatrick  
20 Supervising Special Investigator

21  
22  
23  
24 cc: WILLIAM ELADIN FLORES  
25 World Wide Credit Corporation  
26 Veronica Kilpatrick  
27 Sacto.