

**FILED**

**AUG 16 2022**

**DEPT. OF REAL ESTATE**

By 

1 LAURENCE D. HAVESON, Counsel (SBN 152631)  
2 Department of Real Estate  
3 320 West 4th Street, Suite 350  
4 Los Angeles, California 90013-1105  
5 Telephone: (213) 576-6982  
6 Direct: (213) 576-6854  
7 Fax: (213) 576-6917  
8 Email: Laurence.Haveson@dre.ca.gov  
9 *Attorney for Complainant*

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of  
HUNG QUANG TRAN,  
Respondent.

No. H-42395-LA  
ACCUSATION

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator for the Department of Real Estate ("Department" or "DRE") of the State of California, for cause of Accusation against HUNG QUANG TRAN ("TRAN" or "Respondent"), is informed and alleges as follows:

1. The Complainant, Veronica Kilpatrick, acting in her official capacity as a Supervising Special Investigator, makes this Accusation against Respondent.

2. All references to the "Code" are to the California Business and Professions Code and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

**LICENSE HISTORY**

3. Respondent TRAN is presently licensed and/or has license rights under the Code, as a real estate broker ("REB") with Department license ID 00931318.

4. Respondent's REB license was originally issued on December 24, 1987, and is scheduled to expire on December 23, 2023, unless renewed.

///





1 knowledge examination required for course credit. It was determined that Respondent had used  
2 REES to obtain four (4) years of course credits from 2017 to 2020 in violation of the ROC under  
3 the in-person fraud scheme.

4 20. The ROC provide in relevant part:

5 ROC 3: I understand that the SAFE Act and state laws require me to spend  
6 a specific amount of time in specific subject areas. Accordingly, I will not attempt  
7 to circumvent the requirements of any NMLS approved course.

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

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

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

17 21. By using the services of another to complete his CE and receiving fraudulent  
18 course credits through a non-existent course, Respondent violated ROC 3, 5, 8, and 9, and  
19 engaged in conduct that was dishonest, fraudulent, and that adversely impacted the integrity of the  
20 courses he completed and the conditions and qualifications for which Respondent sought licensure  
21 or renewal of licensure.

22 Financial Responsibility, Character, and General Fitness

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

28 ///



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

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

5 **COSTS**

6 (COSTS OF INVESTIGATION AND ENFORCEMENT)

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

11 WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this  
12 Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action  
13 against all the licenses and license rights of Respondent HUNG QUANG TRAN under the Real  
14 Estate Law, for the costs of investigation and enforcement as permitted by law, and for such other  
15 and further relief as may be proper under other applicable provisions of law.

16  
17 Dated at San Diego, California this 16 day of August, 2022.

18 *Veronica Kilpatrick*

19 \_\_\_\_\_  
20 Veronica Kilpatrick  
Supervising Special Investigator

21 cc: HUNG QUANG TRAN  
22 Veronica Kilpatrick  
23 Sacto.  
24  
25  
26  
27  
28