1 2	STEVE CHU, Counsel (SBN 238155) Department of Real Estate 320 West 4th Street, Suite 350 SEP 1 0 2022
3	Los Angeles, California 90013-1105 SEP 1 9 2022
4	Dept. of Real ESTATE DEPt. Of Real ESTATE By Email By Email
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9	BEFORE THE DEPARTMENT OF REAL ESTATE
10	STATE OF CALIFORNIA
11	* * *
12	In the Matter of the Accusation of) No. H-05288 SD
13	JAMES MATTHEW HALL,) $\underline{ACCUSATION}$
14) Respondent.
15)
16	The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
17	State of California, for cause of Accusation against JAMES MATTHEW HALL
18	("Respondent"), is informed and alleges as follows:
19	1.
20	The Complainant, Veronica Kilpatrick, acting in her official capacity as a
21	Supervising Special Investigator of the State of California, makes this Accusation against
22	JAMES MATTHEW HALL.
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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	Accusation of James Matthew Hall
	- 1 -

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1	3.
2	Respondent JAMES MATTHEW HALL presently has license rights under the
3	Real Estate Law, Part 1 of Division 4 of the Code as a real estate broker.
4	SAN DIEGO PROPERTY TRANSACTION
5	4.
6	On or about December 20, 2019, seller L. Garnder sold real property at 11489
7	Spruce Run Drive #A, San Diego, California 92131 ("San Diego property") to buyer J.
8	Aldawoodi for \$476,000. Respondent represented buyer J. Aldawoodi in the San Diego
9	property transaction and Respondent promised to provide one and one half percent (1.5%)
10	commission or \$7,140 to buyer J. Aldawoodi. Respondent used the unlicensed fictitious
11	business name "Hall Team Real Estate" in the San Diego property transaction.
12	5.
1.3	Respondent failed to provide the promised one and one half percent (1.5%)
14	commission or \$7,140 to buyer J. Aldawoodi.
15	6.
16	On or about April 1, 2021, the Superior Court of California, County of San
17	Diego, Small Claims Case No. 37-2020-00021575-SC-SC-CTL, entered judgment in favor of
18	buyer J. Aldawoodi against Respondent in the amount of \$7,140 principal and \$75 costs. Buyer
19	J. Aldawoodi filed the action against Respondent for Respondent's failure to provide the
20	promised one and one half percent (1.5%) commission or \$7,140 to buyer J. Aldawoodi.
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	Accusation of James Matthew Hall
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SAN JUAN CAPISTRANO PROPERTY TRANSACTION

2	7.
3	On or about August 27, 2020, seller Toll West Coast, LLC sold real property at
4	26324 Paseo Lluvia, San Juan Capistrano, California 92675 ("San Juan Capistrano property")
5	to buyers C. Leem for \$1,709,318. Respondent represented buyers C. Leem in the San Juan
6	Capistrano property transaction and Respondent promised to provide \$27,500 commission to
7	buyers C. Leem. Respondent used the unlicensed fictitious business name "Hall Team Real
8	Estate" in the San Juan Capistrano property transaction.
9	8.
10	Respondent failed to provide the promised \$27,500 commission to buyers C.
11	Leem, and Respondent only provided \$5,000 to buyers C. Leem.
12	INVESTIGATION OF MAIN OFFICE ADDRESS
13	9.
14	From December 26, 2019, to the present, the main office address maintained by
15	Respondent with the Department of Real Estate ("Department") is 1902 Wright Pl, Carlsbad,
16	California 92008.
17	10.
18	On or about May 24, 2021, a Department investigation revealed that Respondent
19	failed to maintain an office at 1902 Wright Pl, Carlsbad, California 92008.
20	FIRST CAUSE OF ACTION
21	FRAUD AND DISHONEST DEALING
22	11.
23	The conduct, acts, and omissions of Respondent, as described in Paragraphs 4
24	through 8 above, are in violation of Code section 10176(a), 10176(b), 10176(c), 10176(i),
25	10177(d), 10177(g), and/or 10177(j) and constitute cause under Code sections 10176(a),
26	10176(b), 10176(c), 10176(i), 10177(d), 10177(g), and/or 10177(j) for the suspension or
27	revocation of all the licenses, license endorsements, and license rights of Respondent.
	Accusation of James Matthew Hall
	- 3 -

1	SECOND CAUSE OF ACTION
2	USE OF UNLICENSED FICTITIOUS BUSINESS NAME
3	12.
4	The conduct, acts, or omissions of Respondent, as described in Paragraphs 4 and
5	7 above, are in violation of Code section 10159.5 and Regulations section 2731 and constitute
6	cause under Code sections 10177(d) and/or 10177(g) for the suspension or revocation of all the
7	licenses, license endorsements, and license rights of Respondent.
8	THIRD CAUSE OF ACTION
9	FAILURE TO MAINTAIN MAIN OFFICE
10	13.
11	The conduct, acts, or omissions of Respondent, as described in Paragraphs 9 and
12	10 above, are in violation Code section 10162 and Regulations section 2715 and constitute
13	cause under Code sections 10165, 10177(d), and/or 10177(g) for the suspension or revocation
14	of all the licenses, license endorsements, and license rights of Respondent.
15	14.
16	Code section 10106 provides, in pertinent part, that in any order issued in
17	resolution of a disciplinary proceeding before the Department of Real Estate, the Commissioner
18	may request the administrative law judge to direct a licensee found to have committed a
19	violation of this part to pay a sum not to exceed the reasonable costs of the investigation and
20	enforcement of the case.
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	Accusation of James Matthew Hall

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1	WHEREFORE, Complainant prays that a hearing be conducted on the
2	allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3	disciplinary action against all the licenses, license endorsements, and license rights of
4	Respondent JAMES MATTHEW HALL under the Real Estate Law, for the cost of
5	investigation and enforcement as permitted by law, and for such other and further relief as may
6	be proper under other applicable provisions of law.
7	
8	Dated at San Diego, California
9	this <u>15</u> day of <u>September</u> , 20 22
10	Varonica Kilnatrick
11	Veronica Kilpatrick
12	Veronica Kilpatrick Supervising Special Investigator
13	
14	cc: JAMES MATTHEW HALL
15	Veronica Kilpatrick
16	Sacto.
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	Accusation of James Matthew Hall
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