

1 STEVE CHU, Counsel (SBN 238155)  
2 Department of Real Estate  
3 320 West 4th Street, Suite 350  
4 Los Angeles, California 90013-1105

5 Telephone: (213) 620-6430  
6 Fax: (213) 576-6917

**FILED**

OCT 06 2022

DEPT. OF REAL ESTATE  
By *Eduardo*

7  
8  
9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 \* \* \*

12 In the Matter of the Accusation of ) No. H-05698 SD  
13 EDDY MARIN, ) ACCUSATION  
14 Respondent. )  
15 \_\_\_\_\_ )

16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the  
17 State of California, for cause of Accusation against EDDY MARIN (“Respondent”), is  
18 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 EDDY MARIN.

23 2.

24 All references to the “Code” are to the Real Estate Law, Part 1 of Division 4 of  
25 the California Business and Professions Code.

26 ///

27 ///

Accusation of Eddy Marin

1 3.

2 Respondent presently has license rights under the Real Estate Law, Part 1 of  
3 Division 4 of the Code, as a real estate broker. Respondent also has license rights for an  
4 individual mortgage loan originator (“MLO”) license endorsement. Respondent also has  
5 license rights as the designated officer of Veranera Holding Corporation.

6 4.

7 Respondent is currently, or at the time of the violations described herein was,  
8 employed by and authorized to represent Modern Mortgage Lending, Inc. and First Team Real  
9 Estate - Orange County, mortgage companies licensed under the Department of Real Estate.

10 5.

11 Respondent violated the National Mortgage Licensing System and Registry  
12 (“NMLS”) student Rules of Conduct by using the services of Danny Yen, doing business as  
13 Real Estate Educational Services, to complete Respondent’s NMLS-approved online continuing  
14 education courses, which constitutes a violation of the licensing requirements of this state and  
15 under federal law. Specifically, Respondent used and compensated Real Estate Educational  
16 Services to complete a class in 2020 on Respondent’s behalf. The course for which Respondent  
17 received course credit was completed by Real Estate Educational Services through an Internet  
18 Protocol (“IP”) address associated with Real Estate Educational Services, rather than an IP  
19 address associated with Respondent.

20 6.

21 The State Regulatory Registry LLC (“State Regulatory Registry”), which owns  
22 and operates the NMLS, administers pre-licensure and continuing education and Uniform State  
23 Test protocols. Title V of Public Law 110-289, the Secure and Fair Enforcement for Mortgage  
24 Licensing Act of 2008 (“SAFE Act”), requires that state-licensed MLOs complete pre-licensure  
25 education courses prior to initial licensure and annual continuing education courses thereafter.  
26 (See Code section 10166.06).

27 ///

1 7.

2 In order to meet pre-licensure education requirements contemplated under the  
3 SAFE Act, state-licensed MLOs must complete 20 hours of NMLS-approved education. Code  
4 section 10166.06(a).

5 8.

6 In order to meet continuing education requirements contemplated under the  
7 SAFE Act, state-licensed MLOs must complete eight hours of NMLS-approved education.  
8 Code section 10166.10(a).

9 9.

10 Real Estate Educational Services had NMLS course provider number 1405046  
11 and was an NMLS-approved course provider during the years 2017 to 2020.

12 10.

13 The NMLS had approved Real Estate Educational Services to offer one  
14 in-person 8-hour “DBO-SAFE Act Comprehensive: Mortgage Continuing Education” course.

15 11.

16 Real Estate Educational Services was never approved by the NMLS to offer  
17 online pre-licensure or online continuing education to MLOs.

18 12.

19 During all times relevant herein, Real Estate Educational Services had its  
20 primary place of business located at 3643 Adams Street, Carlsbad, California.

21 13.

22 During all times relevant herein, Real Estate Educational Services, by and  
23 through Danny Yen, maintained with Danny Yen’s Internet Service Provider an IP address  
24 at 76.88.84.139 (“the relevant IP Address”). The relevant IP Address assigned to Danny Yen is  
25 associated with Real Estate Educational Services’s business address, 3643 Adams Street,  
26 Carlsbad, California.

27 ///

1 14.

2 The Mortgage Testing and Education Board, which was created by the State  
3 Regulatory Registry, has approved “Administrative Action Procedures for S.A.F.E. Testing and  
4 Education Requirements” (“Administrative Action Procedures”), which extends administrative  
5 authority to the Mortgage Testing and Education Board to investigate alleged violations of the  
6 NMLS student Rules of Conduct (“Rules of Conduct”).

7 15.

8 The Administrative Action Procedures also extends administrative authority to  
9 the Mortgage Testing and Education Board and the State Regulatory Registry to investigate  
10 alleged violations of the NMLS Standards of Conduct (“Standards of Conduct”), which apply to  
11 all NMLS–Approved course providers.

12 16.

13 In late 2020, the State Regulatory Registry obtained information concerning  
14 suspicious activity and that that information identified a possible MLO education cheating  
15 scheme coordinated by and implemented through Real Estate Educational Services and its  
16 owners and operators, including Danny Yen. Based on that information, and pursuant to the  
17 Administrative Action Procedures, the State Regulatory Registry initiated an investigation into  
18 the matter.

19 17.

20 On or about December 15, 2020, the State Regulatory Registry staff received a  
21 “suspicious relations” report involving suspected individuals completing online  
22 NMLS–approved education courses on behalf of another.

23 18.

24 Subsequent State Regulatory Registry research (“State Regulatory Registry  
25 report”) found at least 113 education students associated with taking online pre-licensure and  
26 continuing education courses from the relevant IP Address in Carlsbad, California.

27 ///

Accusation of Eddy Marin

1 19.

2 Respondent was identified in the State Regulatory Registry report as one of the  
3 113 students that had completed pre-licensure or continuing education courses from the  
4 relevant IP Address in Carlsbad, California and who received NMLS course credit.

5 20.

6 A Department of Real Estate investigation has determined that the relevant  
7 IP Address belonged to Danny Yen, Real Estate Educational Services' owner and operator, at  
8 the physical address 3643 Adams Street, Carlsbad, California.

9 21.

10 Respondent does not reside or work at 3643 Adams Street, Carlsbad, California,  
11 the physical address associated with the relevant IP Address identified by the Department of  
12 Real Estate as belonging to Real Estate Educational Services.

13 22.

14 Based upon the results of the State Regulatory Registry report and the relevant  
15 IP Address information, it was determined that Respondent had used the services of Real Estate  
16 Educational Services and compensated Real Estate Educational Services to complete a  
17 continuing education course in 2020, in violation of the Rules of Conduct.

18 23.

19 The Rules of Conduct provide in relevant part:

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

22 Rules of Conduct 5: I will not seek or attempt to seek outside assistance to  
23 complete the course.

24 Rules of Conduct 9: I will not engage in any conduct that is dishonest,  
25 fraudulent, or would adversely impact the integrity of the course(s) I am completing and the  
26 conditions for which I am seeking licensure or renewal of licensure.

27 ///

Accusation of Eddy Marin



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

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, license endorsements, and license rights of Respondent EDDY MARIN under the Real Estate Law, for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at San Diego, California  
this 5th day of October, 2022.

*Maria Suarez for VKilpatrick*  
Veronica Kilpatrick  
Supervising Special Investigator

cc: EDDY MARIN  
First Team Real Estate - Orange County  
Veronica Kilpatrick  
Sacto.