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**FILED**

**AUG - 6 2025**

**DEPT. OF REAL ESTATE**

By. 

BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

|                                               |   |                            |
|-----------------------------------------------|---|----------------------------|
| In the Matter of the Accusation of            | ) | No. H-05887 SD             |
|                                               | ) |                            |
| HOBAN MANAGEMENT INC,                         | ) | <u>A C C U S A T I O N</u> |
| THOMAS JOHN HOBAN,                            | ) |                            |
| doing business as Hoban Management,           | ) |                            |
| individually and as former designated officer | ) |                            |
| of Hoban Management Inc, and                  | ) |                            |
| ZACHARY MICHAEL NATION,                       | ) |                            |
|                                               | ) |                            |
| Respondents.                                  | ) |                            |

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for cause of Accusation against HOBAN MANAGEMENT INC, THOMAS JOHN HOBAN, doing business as Hoban Management, individually and as former designated officer of Hoban Management Inc, and ZACHARY MICHAEL NATION ("Respondents"), is informed and alleges as follows:

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Accusation of HOBAN MANAGEMENT INC, THOMAS JOHN HOBAN,  
and ZACHARY MICHAEL NATION

1. 1

2 The Complainant, Veronica Kilpatrick, acting in her official capacity as a  
3 Supervising Special Investigator of the State of California, makes this Accusation against  
4 HOBAN MANAGEMENT INC, THOMAS JOHN HOBAN, and ZACHARY MICHAEL  
5 NATION.

2. 6

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

9 LICENSE HISTORY

3. 10

11 Respondent HOBAN MANAGEMENT INC ("HOBAN MANAGEMENT")  
12 presently has license rights under the Real Estate Law, Part 1 of Division 4 of the Code as a  
13 corporate real estate broker. On August 10, 2023, HOBAN MANAGEMENT'S license  
14 expired. Pursuant to Code section 10201, Respondent retains renewal rights for two years. The  
15 Department of Real Estate ("Department") holds jurisdiction over the lapsed license, pursuant  
16 to Code section 10103.

4. 17

18 Respondent THOMAS JOHN HOBAN ("HOBAN") presently has license rights  
19 as the designated officer of HOBAN MANAGEMENT. On August 10, 2023, HOBAN'S  
20 license expired. Pursuant to Code section 10201, Respondent retains renewal rights for two  
21 years. The Department holds jurisdiction over the lapsed license, pursuant to Code  
22 section 10103.

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and ZACHARY MICHAEL NATION

1 5.

2 Respondent HOBAN MANAGEMENT was licensed by the Department as a  
3 corporate real estate broker by and through Respondent HOBAN, as the designated officer and  
4 broker responsible, pursuant to Code section 10159.2, for supervising the activities requiring a  
5 real estate license conducted on behalf of HOBAN MANAGEMENT, or by HOBAN  
6 MANAGEMENT'S officers, agents and employees.

7 6.

8 Respondent ZACHARY MICHAEL NATION ("NATION") presently has  
9 license rights as a real estate broker. The Department issued a real estate broker license to  
10 NATION on or about June 15, 2022.

11 7.

12 From about September 5, 2019, to about June 14, 2022, Respondent NATION  
13 was affiliated as a salesperson with responsible broker Respondent HOBAN MANAGEMENT.  
14 NATION has never affiliated as a broker associate with any broker after June 14, 2022.

15 UNLICENSED REAL ESTATE ACTIVITY

16 8.

17 From October 1, 2020, to the present, Respondent HOBAN MANAGEMENT  
18 acted as a real estate broker, conducting licensed activities within the meaning of Code  
19 section 10131(b) (leasing, renting or offering to lease or rent real property for another).

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1 9.

2 On or about August 11, 2023, Respondents HOBAN MANAGEMENT and  
3 HOBAN sent a letter to property owner R. Melucci regarding an addendum to the property  
4 management agreement for real property at 8031 Winter Gardens Blvd., El Cajon,  
5 California 92021 ("Shannonwood Townhomes"), 700 Ballantyne St, El Cajon,  
6 California 92021 ("Sandalwood Apartments"), and 4055 Arizona St, San Diego,  
7 California 92104 ("Arizona Towers"). The letter said in part, "Effective August 11, 2023,  
8 Zachary Nation was added as an officer to the corporation and assumed the role of Vice  
9 President, joining myself, Tom Hoban, in overseeing the operations and future direction of  
10 Hoban Property Management. This strategic addition is designed to further strengthen our  
11 management team and provide a more robust foundation for the long-term success and  
12 prosperity of both Hoban Property Management and the properties under our care."

13 10.

14 On or about January 25, 2025, a Department Special Investigator went to the  
15 websites <https://hobanmanagement.com> and <https://www.rentalsinsandiego.com>, where  
16 Respondent HOBAN MANAGEMENT advertised properties for rent under the name Hoban  
17 Property Management and identified Respondent HOBAN as President and Respondent  
18 NATION as Co-Director. The Department Special Investigator found a listing at  
19 <https://hobanmanagement.com> for Shannon Wood Townhomes at 8031 Winter Gardens Blvd.,  
20 El Cajon, California 92021. The Department Special Investigator clicked on the listing for  
21 Shannon Wood Townhomes, the website became <https://www.shannonwoodapartments.com>  
22 which provided the phone number (619) 561-5693. The Department Special Investigator  
23 called (619) 561-5693, and the person who answered the phone identified herself as Yvonne.  
24 Yvonne told the Department Special Investigator that she was the onsite manager at Shannon  
25 Wood Townhomes, that she collected information for the corporate office Hoban Management,  
26 and that Hoban Management made the decisions.

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Accusation of HOBAN MANAGEMENT INC, THOMAS JOHN HOBAN,  
and ZACHARY MICHAEL NATION

11.

On or about January 29, 2025, a Department Special Investigator sent an email to Respondent HOBAN requesting information regarding the property management activities of Respondent HOBAN MANAGEMENT. On or about February 12, 2025, HOBAN sent an email to the Department Special Investigator with property management accountings for Shannonwood Townhomes for 2023, 2024, and 2025.

12.

On or about April 24, 2025, a Department Special Investigator interviewed Respondent NATION. NATION told the Department Special Investigator that NATION is running things at Respondent HOBAN MANAGEMENT and that Respondent HOBAN advises and assists as needed.

FIRST CAUSE OF ACTION

(ENGAGING IN LICENSED ACTIVITY WITHOUT A VALID LICENSE)

13.

The conduct, acts, and omissions of Respondents HOBAN MANAGEMENT, HOBAN, and NATION, as described in Paragraphs 3 through 13 above, are in violation of Code sections 10130, 10137, 10177(d), and/or 10177(g), constitute cause under Code sections 10137, 10177(d), and/or 10177(g) for the suspension or revocation of all the licenses, license endorsements, and license rights of HOBAN MANAGEMENT, HOBAN, and NATION.

14.

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

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and ZACHARY MICHAEL NATION

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 and license rights of Respondents HOBAN  
4 MANAGEMENT INC, THOMAS JOHN HOBAN, and ZACHARY MICHAEL NATION  
5 under the Real Estate Law, for the cost of investigation and enforcement as permitted by law,  
6 and for such other and further relief as may be proper under other applicable provisions of law.

7  
8 Dated at San Diego, California

9 this 1st day of August, 2025

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12 \_\_\_\_\_  
13 Veronica Kilpatrick  
14 Supervising Special Investigator

15 cc: HOBAN MANAGEMENT INC  
16 THOMAS JOHN HOBAN  
17 ZACHARY MICHAEL NATION  
18 Veronica Kilpatrick  
19 Sacto.  
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Accusation of HOBAN MANAGEMENT INC, THOMAS JOHN HOBAN,  
and ZACHARY MICHAEL NATION