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FILED
DEC 14 2023
DEPARTMENT OF REAL ESTATE
By J. Taggart

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)	
)	No. H- 12712 SF
)	
RONG FU,)	<u>ACCUSATION</u>
)	
Respondent.)	
)	

The Complainant, STEPHANIE YEE, acting in her official capacity as a
Supervising Special Investigator of the State of California, for cause of Accusation against
RONG FU (Respondent), is informed and alleges as follows:

1

Respondent is presently licensed and/or has license rights under the Real Estate
Law, Part 1 of Division 4, of the Business and Professions Code (Code) as a real estate
salesperson.

2

On or about August 29, 2022, the California Board of Accountancy, Department
of Consumer Affairs, in Case No. AC-2022-11, ordered that Respondent's Certified Public
Accountant Certificate be revoked, stayed, and placed on probation for three (3) years, with
conditions, including a permanent ban on conducting audits.

3

In a stipulated settlement, Respondent admitted to each, and every allegation of the Accusation filed by the Board of Accountancy, which included repeated negligent acts under Section 5100(c) of the Regulations and numerous sections of Title 16 of the California Code of Regulations.

4

The facts alleged in Paragraphs 2 and 3 constitute grounds under Section 10177(f) of the Code for suspension or revocation of all licenses and license rights of Respondent under Part 1 of Division 4 of the Code.

5

A diligent search was made of the records of the Department of Real Estate (Department), relating to Respondent's Real Estate Salesperson License. As a result of said search, no written record was discovered of Respondent notifying the Department of any license disciplinary action.

6

The facts alleged in Paragraphs 2, 3 and 5 constitutes a violation of Section 10186.2 (failure to report administrative discipline within 30 days) of the Code, and are grounds for the suspension or revocation of all licenses and license rights of Respondent under Section 10177(d) of the Code.

7

Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the department, 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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1 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
2 of this Accusation and that upon proof thereof, a decision be rendered revoking all licenses and
3 license rights of Respondent under the Real Estate Law, for the cost of investigation and
4 enforcement as permitted by law, and for such other and further relief as may be proper under
5 other provisions of law.

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7

8 STEPHANIE YEE

9 Supervising Special Investigator

10 Dated at Oakland, California, on
11 this 8th day of December, 2023.

12
13 DISCOVERY DEMAND

14 The Department of Real Estate hereby requests discovery pursuant to Section
15 11507.6 of the California Government Code. Failure to provide discovery to the Department
16 may result in the exclusion of witnesses and/or documents at the hearing, and other sanctions as
17 the Administrative Law Judge deems appropriate.