

1 Professions Code, hereinafter "Code") as a real estate broker.
2 Respondent was originally licensed as a real estate broker by
3 the Department of Real Estate (hereinafter "Department") on or
4 about January 6, 2009. Since January 6, 2009, Respondent has
5 had the fictitious business name "Touchdown Lending" registered
6 with the Department.

7 3.

8 Respondent engaged in the business of a real estate
9 broker in the State of California within the meaning of Code
10 Sections 10131(d) and 10131.2, including performing services
11 for borrowers and claiming, demanding, charging, receiving,
12 collecting or contracting for the collection of an advance fee,
13 within the meaning of Code Section 10026, including, but not
14 limited to, the following loan modification activities with
15 respect to a loan which was secured by a lien(s) on real
16 property.

17 4.

18 On or about January 17, 2009, Respondent entered into
19 an agreement with Saleta Darnell to perform services with
20 respect to a loan secured by a lien(s) on real property located
21 at 3438 West 59th Place, Los Angeles, CA, in exchange for the
22 payment of an advance fee of \$695. On January 20, 2009, Saleta
23 Darnell submitted the \$695 advance fee to Touchdown Lending,
24 for services regarding a loan modification.

25 5.

26 The agreement described in Paragraph 4 above
27 constitutes an advance fee agreement within the meaning of Code

1 Section 10026. Respondent failed to submit the advance fee
2 agreement to the Commissioner ten days before using it, in
3 violation of Code Sections 10085 and 10085.5, as well as
4 Section 2970 of Title 10, California Code of Regulations
5 ("Regulations").


6 6.

7 The conduct, acts and/or omissions of Respondent as
8 set forth in above are cause for the suspension or revocation
9 of the licenses and license rights of Respondent pursuant to
10 Code Sections 10085, 10177(d) and/or 10177(g).

11 WHEREFORE, Complainant prays that a hearing be
12 conducted on the allegations of this Accusation and that upon
13 proof thereof, a decision be rendered imposing disciplinary
14 action against all the licenses and license rights of Respondent
15 TAI THANH NGUYEN, dba Touchdown Lending, under the Real Estate
16 Law, and for such other and further relief as may be proper
17 under other applicable provisions of law.

18 Dated at Los Angeles, California

19 this 8th day of December 2011.

20
21
22
23 
24 Maria Suarez
Deputy Real Estate Commissioner

25 cc: TAI THANH NGUYEN
26 Maria Suarez
27 Sacto.