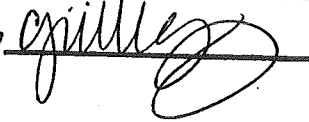


FILED

OCT - 9 2014

BUREAU OF REAL ESTATE

By



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BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of	)	No. H- 39615 LA
	)	
RENOVATIO CAPITAL, INC.; and	)	
WAYNE ANDREW KIM, JR.,	)	<u>ACCUSATION</u>
individually and as designated	)	
officer of Renovatio Capital,	)	
Inc.,	)	
	)	
Respondents.	)	

The Complainant, Veronica Kilpatrick, a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against Respondents RENOVATIO CAPITAL, INC. ("RCI") and WAYNE ANDREW KIM, JR. ("KIM") aka Wayne Kim, individually and as designated officer of Renovatio Capital, Inc., is informed and alleges as follows:

1.

The Complainant, Veronica Kilpatrick, a Deputy Real Estate Commissioner of the State of California, makes this Accusation in her official capacity.

2.

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

3.

A. RENOVATIO CAPITAL, INC.: From or about April 23, 2008 through the present, Respondent RCI was and still is licensed and/or has license rights under the Real Estate Law (Part 1 of Division 4 of the California Business and Professions Code) as a real estate corporation.

B. WAYNE ANDREW KIM, JR.: Respondent KIM was and still is licensed and/or has license rights under the Real Estate Law as a real estate broker during the following time periods: (a) from or about October 24, 1998 to on or about October 23, 2002; (b) from or about November 15, 2002 to on or about November 14, 2006; (c) from on or about May 14, 2007 to on or about May 13, 2011; and (d) from or about June 15, 2011 through the present. At all times, Respondent RCI was authorized to act by and through Respondent KIM as its designated broker and officer who is responsible for ensuring compliance with the Real Estate Law pursuant to Code sections 10159.2 and 10211.

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1 8.

2 The suspension of corporate powers, rights, and
3 privileges of Respondent RCI, as alleged above, are in violation
4 of Regulation section 2742(c), and subjects its real estate
5 license and license rights to suspension or revocation pursuant
6 to Code sections 10177(d), 10177(f), and/or 10177(g).

7
8 SECOND CAUSE OF ACCUSATION

9 (Failure to Supervise)

10 9.

11 The conduct, acts, and/or omissions of Respondent KIM,
12 in allowing Respondent RCI to violate the Real Estate Law, as
13 set forth above, constitutes a failure by Respondent KIM, as the
14 officer designated by the corporate broker licensee, to exercise
15 the supervision and control of the activities conducted on
16 behalf of Respondent RCI by its offices and employees as
17 required by Code section 10159.2 and Regulation 2725, and is
18 cause to suspend or revoke the real estate license and license
19 rights of Respondent KIM pursuant to Code sections 10177(d)
20 and/or 10177(g) and 10177(h).

21 Code section 10106 provides, in pertinent part, that
22 in any order issued in resolution of a disciplinary proceeding
23 before the bureau, the Commissioner may request the
24 administrative law judge to direct a licensee found to have
25 committed a violation of this part to pay a sum not to exceed
26
27

1 the reasonable costs of investigation and enforcement of the
2 case.

3 WHEREFORE, Complainant prays that a hearing be
4 conducted on the allegations of this Accusation and that upon
5 proof thereof, a decision be rendered imposing disciplinary
6 action against all licenses and/or license rights under the Real
7 Estate Law (Part 1 of Division 4 of the California Business and
8 Professions Code) of Respondents RENOVATIO CAPITAL, INC. and
9 WAYNE ANDREW KIM, JR., individually and as designated officer of
10 Renovatio Capital, Inc., for the cost of investigation and
11 enforcement as permitted by law, and for such other and further
12 relief as may be proper under applicable provisions of law.

13 Dated at San Diego, California: Sept 16, 2014.

14 
15 _____
16 Veronica Kilpatrick
17 Deputy Real Estate Commissioner
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25 cc: Renovatio Capital, Inc.
26 Wayne Andrew Kim, Jr.
27 Veronica Kilpatrick
Sacto.