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FILED
DEC 21 2015
BUREAU OF REAL ESTATE
By *John Gail*

BEFORE THE BUREAU OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of) No. H- 40072 LA
)
PAUL CONG NGUYEN,) ACCUSATION
)
Respondent.)
_____)

The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California, for cause of Accusation against PAUL CONG NGUYEN ("Respondent"), alleges as follows:

1.

The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California, makes this Accusation in her official capacity.

2.

Respondent presently has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code ("Code"), as a real estate broker with an mortgage loan originator endorsement.

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ACCUSATION OF PAUL CONG NGUYEN

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1 5.

2 Respondent's State Bar license was disciplined, as described in Paragraphs 3 and
3 4 above, for acts which, if committed by a real estate licensee, would constitute grounds for the
4 suspension or revocation of a California real estate license, pursuant to Section 10085.6 of the
5 Code.

6 6.

7 The prior license actions against Respondent, as alleged in Paragraphs 3 and 4
8 above, constitute cause for the suspension or revocation of the license or license rights of
9 Respondent under Section 10177(f) of the Code.

10 These proceedings are brought under the provisions of Section 10100, Division
11 4 of the Business and Professions Code of the State of California and California Government
12 Code sections 11500 through 11528.

13 COST RECOVERY

14 (INVESTIGATION AND ENFORCEMENT COSTS)

15 7.

16 California Business and Professions Code Section 10106, provides, in pertinent
17 part, that in any order issued in resolution of a disciplinary proceeding before the Bureau of
18 Real Estate, the Commissioner may request the administrative law judge to direct a licensee
19 found to have committed a violation of this part to pay a sum not to exceed the reasonable costs
20 of the investigation and enforcement of the case.

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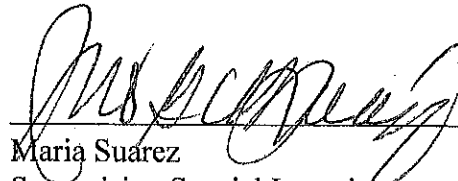
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27 ACCUSATION OF PAUL CONG NGUYEN

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 Respondent PAUL CONG
4 NGUYEN under the Real Estate Law for the cost of investigation and enforcement as permitted
5 by law, and for such other and further relief as may be proper under other applicable provisions
6 of law.

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8 Dated at Los Angeles, California

9 this 16th day of December, 2015

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14 Maria Suarez
Supervising Special Investigator

15 cc: PAUL CONG NGUYEN
16 Maria Suarez
17 Sacto.
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