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**FILED**

**FEB - 9 2016**

**BUREAU OF REAL ESTATE**

By *[Signature]*

BEFORE THE BUREAU OF REAL ESTATE  
STATE OF CALIFORNIA

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In the Matter of the Accusation of	)	No. H- 40134 LA
	)	
SUNG WOOK YANG,	)	<u>ACCUSATION</u>
	)	
Respondent.	)	
	)	

The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California for cause of Accusation against SUNG WOOK YANG aka Aaron Clay Broadway aka Sung Ook Yang ("Respondent") alleges as follows:

1.

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

2.

Respondent is presently 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 broker (license number 01702342).

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(CRIMINAL INFORMATION AND CONVICTIONS)

3.

On or about April 24, 2013, in the Superior Court of California, County of Orange, case no. 12WF0612, an Information was filed charging Respondent with 21 felony counts. On or about October 18, 2013, a First Amended Information was filed charging Respondent with 19 felony counts. On or about February 7, 2014, a Second Amended Information was filed charging Respondent with California Penal Code sections 236/237(a) (false imprisonment by violence/deceit), 530.5(a) (identity theft), 236/237(a) (false imprisonment by violence/deceit), 487(a) (grand theft), and 470 (forgery), all felonies.

4.

On or about April 14, 2014, in the Superior Court of California, County of Orange, case no. 12WF0612, Respondent was convicted of violating California Penal Code sections 236/237(a) (false imprisonment by violence/deceit), 236/237(a) (false imprisonment by violence/deceit), and 487(a) (grand theft), all felonies. In part, Respondent was sentenced to 3 years of supervised probation, 90 days jail, pay \$11,530.00 in restitution to one victim, and pay \$23,950.00 to a second victim. These crimes are substantially related to the qualifications, functions, or duties of a real estate licensee under Section 2910, Title 10, Chapter 6, California Code of Regulations.

5.

The crimes of which Respondent was convicted, as described above, constitute cause under California Business and Professions Code sections 490, 10177(b), and 10177(j) for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

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1 (MISREPRESENTATION TO BUREAU OF REAL ESTATE)

2 6.

3 On or about July 29, 2013, Respondent filed a Broker Renewal Application with  
4 the Bureau of Real Estate. In response to Question 5 of this license application, to wit: "ARE  
5 THERE CRIMINAL CHARGES PENDING AGAINST YOU AT THIS TIME? IF YES TO  
6 EITHER ITEM 4 OR 5, COMPLETE ITEM 24 ON PAGE 3." Respondent answered, "No,"  
7 and failed to reveal the then-pending case, described in Paragraphs 3 and 4, above.

8 7.

9 Respondent's false statements of material facts on his Broker Renewal  
10 Application constitute grounds for disciplinary action against Respondent's broker license  
11 under California Business and Professions Code sections 475(a)(1), 475(a)(3), 480(d),  
12 10177(a), and 10177(j).

13  
14 (COSTS)

15 8.

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, the  
18 Commissioner may request the administrative law judge to direct a licensee found to have  
19 committed a violation of this part to pay a sum not to exceed the reasonable costs of  
20 investigation and enforcement of the case.

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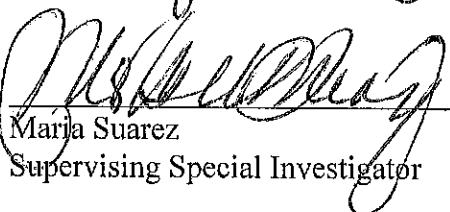
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1 WHEREFORE, Complainant prays that a hearing be conducted on the  
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing  
3 disciplinary action against all licenses and/or license rights under the Real Estate Law (Part 1 of  
4 Division 4 of the California Business and Professions Code) of Respondent SUNG WOOK  
5 YANG for the cost of investigation and enforcement as permitted by law, and for such other  
6 and further relief as may be proper under applicable provisions of law.

7 Dated at Los Angeles, California: 27 January, 2016.

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11 Maria Suarez  
12 Supervising Special Investigator  
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25 cc: SUNG WOOK YANG  
26 Maria Suarez  
27 Sacto.