

FILED

NOV - 6 2017

BUREAU OF REAL ESTATE

By *AS*

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8 BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of) No.H-40844 LA
12 KWANG MAN LEE,) ACCUSATION
13 Respondent.)
14

15 The Complainant, Veronica Kilpatrick, a Supervising
16 Special Investigator of the State of California, for cause of
17 accusation against KWANG MAN LEE, alleges as follows:
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19 1. The Complainant, Veronica Kilpatrick, a Supervising
20 Special Investigator of the State of California, makes this
21 Accusation in her official capacity.

22 2. KWANG MAN LEE (hereinafter referred to as
23 "Respondent") is presently licensed and/or has license rights
24 under the Real Estate Law (Part 1 of Division 4 of the Business
25 and Professions Code, hereinafter referred to as the "Code").

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1 3. Respondent was licensed by the Bureau of Real
2 Estate of the State of California as a real estate broker
3 effective June 9, 2006. The license expires June 8, 2018.

4 4. On or about December 5, 2016, in the US District
5 Court for the Central District of California, case no. CR 15-19-
6 AG, Respondent was convicted of violating 18 USC 201(b) (1)
7 (bribery of public official), a felony.

8 5. The above referenced matter bears a substantial
9 relationship to the qualifications, functions, or duties of a
10 real estate licensee, Title 10, Chapter 6, Section 2910,
11 California Administrative Code.

12 6. Respondent's conviction alleged in Paragraph 4 is
13 cause under Code Sections 490 and 10177(b) for suspension or
14 revocation of all licenses and license rights of Respondent under
15 the Real Estate Law.

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

24 WHEREFORE, Complainant prays that a hearing be
25 conducted on the allegations of this Accusation and that upon
26 proof thereof, a decision be rendered imposing disciplinary
27 action on the license and license rights of Respondent, for the

1 cost of investigation and enforcement as permitted by law, under
2 the Real Estate Law (Part 1 of Division 4 of the Business and
3 Professions Code) and for such other and further relief as may be
4 proper under other applicable provisions of law.

5 Dated at San Diego, California,

6 this 26 day of October, 2017.

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9 VERONICA KILPATRICK
10 Supervising Special Investigator
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25 cc: Kwang Man Lee
26 Veronica Kilpatrick
27 Sacto.