

FILED

JAN 29 2020

BUREAU OF REAL ESTATE

By

[Signature]

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BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of	)	No. H- 41587 LA
	)	
TIN TRUNG VO,	)	<u>ACCUSATION</u>
	)	
Respondent.	)	
	)	

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California for cause of Accusation against TIN TRUNG VO ("Respondent") alleges as follows:

1.

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator 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 no. 01335734).

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1 (CRIMINAL CONVICTION)

2 3.

3 On or about August 23, 2018, in the Superior Court of California, County of
4 Riverside, case no. RIF1700485, Respondent was convicted of three (3) counts of California
5 Labor Code section 6425(a) (violation of occupational or health standard causing death to
6 another), all felonies. In part, Respondent was sentenced to serve sixty (60) months of formal
7 probation, serve 179 days of Work Release Program, and pay various fines and fees. These
8 crimes are substantially related to the qualifications, functions, or duties of a real estate licensee
9 under Section 2910, Title 10, Chapter 6, California Code of Regulations.

10 4.

11 The crimes of which Respondent was convicted, as described in Paragraph 3,
12 above, constitute cause under California Business and Professions Code sections 490 and
13 10177(b) for the suspension or revocation of the license and license rights of Respondent under
14 the Real Estate Law.

15 (FAILURE TO REPORT CONVICTIONS)

16 5.

17 As of April 23, 2019, Respondent has failed to report the convictions, as
18 described in Paragraph 3, above, to the Department of Real Estate.

19 6.

20 Respondent's failure to report the convictions, as described in described in
21 Paragraph 3, above, constitutes cause under California Business and Professions Code section
22 10186.2 for the suspension or revocation of the license and license rights of Respondent under
23 the Real Estate Law.

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25 ///

(COSTS)

7.

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

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

Dated at San Diego, California: January 15, 2019. 2020 ^{UK}

V. Kilpatrick
Veronica Kilpatrick
Supervising Special Investigator

cc: TIN TRUNG VO
Veronica Kilpatrick
Sacto.