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**FILED**  
JUL 01 2021  
DEPT. OF REAL ESTATE  
By Zai J.

BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

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In the Matter of the Accusation of	)	No. H-41983 LA
	)	
DISCREET CAPITAL, INC.,	)	<u>FIRST AMENDED</u>
and MICHAEL HAMILTON CAMP, individually	)	<u>ACCUSATION</u>
and as designated officer of Discreet Capital, Inc.,	)	
and ROBERT LINDSAY BROWN,	)	
	)	
Respondents.	)	

This First Amended Accusation amends the Accusation filed on April 7, 2021. The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for cause of Accusation against DISCREET CAPITAL, INC., MICHAEL HAMILTON CAMP, and ROBERT LINDSAY BROWN (collectively "Respondents") alleges as follows:

1.

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

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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.

LICENSE HISTORY

(DISCREET CAPITAL, INC.)

3.

(a) Respondent DISCREET CAPITAL, INC. ("DCI") 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 corporation, Department of Real Estate<sup>1</sup> ("Department") license ID 01942513.

(b) The Department originally issued DCI's corporate license on October 3, 2013. DCI's license is scheduled to expire on October 2, 2021, unless renewed.

(c) According to the Department's records to date, DCI's main office address is 41700 Ivy Street, Ste C, Murrieta, CA 92562.

(d) According to the Department's records to date, DCI employs 31 salespersons under its real estate license.

(e) According to the Department's records to date, DCI maintains authorized fictitious business names of "Drive Real Estate" and "Roots Realty Group".

(MICHAEL HAMILTON CAMP)

4.

(a) Respondent MICHAEL HAMILTON CAMP ("CAMP") is presently licensed under the Code, as a real estate broker, Department license ID 01714600.

(b) The Department originally issued CAMP's broker license on November 16, 2009. CAMP's license is scheduled to expire on November 15, 2021, unless renewed.

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<sup>1</sup> Between July 1, 2013 and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate under the Department of Consumer Affairs.

1 (c) CAMP is the designated officer for DCI. His designation is scheduled to  
2 expire on October 2, 2021, unless renewed. As designated officer, CAMP is responsible for the  
3 supervision of the activities conducted on behalf of DCI by its officers, agents, real estate  
4 licensees, and employees pursuant to Section 10159.2 of the Code.

5 (d) On November 6, 2018, the Department issued Respondent a Mortgage Loan  
6 Originator ("MLO") license endorsement, National Mortgage Licensing System and Registry  
7 ("NMLS") No. 1627613. Respondent's MLO license endorsement is scheduled to expire in or  
8 about 2021.

9 (ROBERT LINDSAY BROWN)

10 5.

11 (a) Respondent ROBERT LINDSAY BROWN ("BROWN") is presently  
12 licensed under the Code, as a real estate salesperson, Department license ID 00893489.

13 (b) The Department originally issued BROWN's salesperson license on or about  
14 August 9, 1985. BROWN's license is scheduled to expire on July 7, 2024, unless renewed.

15 (c) According to the Department's records to date, from October 17, 2018  
16 through March 16, 2020, BROWN was employed by DCI as a salesperson.

17 6.

18 At all times relevant herein Respondents were engaged in the business of, acted  
19 in the capacity of, advertised or assumed to act as a real estate corporation, within the meaning  
20 of Section 10131(a) and (b) of the Code. Respondents' activities included the leasing or renting  
21 of real property and the collection of rents and security deposits for real property on behalf of  
22 others for compensation or in expectation of compensation.

23 (AUDIT SD200008)

24 7.

25 On or about December 28, 2020, the Department completed an audit  
26 examination of the books and records of DCI pertaining to the real estate activities described in  
27 Paragraph 6 above. The audit examination covered the period of time from November 1, 2018,

1 through March 16, 2020 ("audit period"). The primary purpose of the examination was to  
2 determine whether Respondents conducted real estate activities in accordance with the Real  
3 Estate Law. The audit examination revealed violations of the Code and the Regulations as set  
4 forth in the following paragraphs, and more fully discussed in Audit No. SD200008, and the  
5 exhibits and work papers attached to said audit report.

6 8.

7 At all times mentioned herein, and in connection with the property management  
8 activities described in Paragraph 6, above, BROWN, for DCI, accepted or received funds,  
9 including funds in trust ("trust funds") from or on behalf of actual or prospective parties to  
10 transactions handled by Respondents and thereafter made deposits and/or disbursements of such  
11 funds. According to the documents provided, DCI maintained 1 bank account for handling of  
12 the receipts and disbursements of funds during the audit period in connection with the property  
13 management activities.

14 The bank account is as follows:

15 Bank Account 1 ("BA 1")

16 Bank: BBVA Compass Bank

17 Account Name: West Coast Property Managers

18 Account Number: xxxxxxxx9400

19 Signatories: Robert L Brown, Nicholas Brown

20 Signatures Required: One

21 Purpose: BA 1 was maintained to handle trust funds for DCI's property  
22 management activities for multiple beneficiaries.

23 Violations of the Real Estate Law

24 9.

25 The audit examination revealed violations of the Code and the Regulations, as  
26 set forth in the following paragraphs, and more fully discussed in Audit Report No. LA180128,  
27 and the exhibits and work papers attached to the audit report:

1                   (a) **Handling of Trust Funds/Trust Fund Deposited into Salesperson's Bank**  
2 **Account (Code section 10145(c)).**

3                   From November 1, 2018 to March 16, 2020, BROWN accepted trust funds from  
4 others in connection with the property management activity on behalf of DCI. BROWN did not  
5 deliver said trust funds to DCI, CAMP, and/or deposit trust funds into DCI's trust fund bank  
6 account. The trust funds were instead deposited into BA 1, which is a bank account associated  
7 with West Coast Property Managers.

8                   (b) **Trust Fund Handling For Multiple Beneficiaries (Code section 10145**  
9 **and Regulations section 2832.1).**

10                  Based on an examination of BA 1's records, there was a minimum trust fund  
11 shortage of \$1,945.47 as of March 16, 2020 in violation of Code section 10145 and Regulations  
12 section 2832.1. There is no evidence that Respondents were given written consent from the  
13 owners of the trust funds to allow Respondents to reduce the balance of the funds in BA 1 to an  
14 amount less than the aggregate trust fund liabilities of DCI to all owners of the trust funds.

15                  (c) **Trust Fund Records to be Maintained (Code section 10145 and**  
16 **Regulations section 2831).** Respondents failed to maintain complete and accurate columnar  
17 record for all trust funds received and disbursed (control record) for BA 1, which was used for  
18 property management activities during the audit period in violation of Code section 10145 and  
19 Regulations section 2831. The control record maintained by Respondents had inaccurate daily  
20 balances of trust fund, missing entries, and was not in chronological order.

21                  (d) **Separate Records for Each Beneficiary (Code section 10145 and**  
22 **Regulations section 2831.1).** Respondents failed to maintain complete and accurate separate  
23 records for each beneficiary or transaction of all trust fund receipts and disbursements for BA 1  
24 in connection with DCI's property management activities during the audit period in violation of  
25 Code section 10145 and Regulations section 2831.1. The separate records maintained by  
26 Respondents had inaccurate daily balances of trust fund, missing entries, and was not in  
27 chronological order.

1                   (e) **Trust Account Reconciliation (Code section 10145 and Regulations**  
2 **section 2831.2)**. During the audit period, DCI did not perform and maintain a complete and  
3 accurate monthly reconciliation of the balance of all separate beneficiary and/or transaction  
4 records to the balance of the records of all trust funds received and disbursed for BA 1 in  
5 violation of Code section 10145 and Regulations section 2831.2.

6                   (f) **Trust Fund Handling/Account Designation (Code section 10145 and**  
7 **Regulations section 2832)**. Based on an examination of BA 1's records, BA 1 was not set up in  
8 the name of DCI or its fictitious business name "Drive Real Estate" as trustee. BA 1 was set up  
9 instead in the name of "West Coast Property Managers." DCI did not have control over the  
10 trust funds collected in connection with the property management activity.

11                   (g) **Trust Account Withdrawal (Code section 10145 and Regulations section**  
12 **2834)**. According to BA 1's records, CAMP was not a signatory to BA 1. CAMP did not retain  
13 a written authorization on file to allow BROWN to sign on and make withdrawals from BA 1.  
14 BA 1's bank signature card contained the signatory Nicholas Brown (non-employee of DCI,  
15 non-licensee), who was allowed to sign and make withdrawals from BA 1.

16                   (h) **Commingling/Excess Broker's Funds Held in Bank Account that**  
17 **Handled Trust Funds (Code sections 10145 and 10176(e) and Regulations section**  
18 **2835(a))**. DCI kept more than \$200 of its own funds in BA 1. As of March 16, 2020, DCI had a  
19 balance of \$289.24 of its own funds in BA 1.

20                   (i) **Use of Unlicensed Fictitious Name (Code section 10159.5 and Regulations**  
21 **section 2731)**. During the audit period, DCI used the unlicensed fictitious business names  
22 "West Coast Property Managers" and "West Coast Management" in connection with the  
23 property management activities without first obtaining authorization from the Department.  
24 These fictitious business names do not show up in the Department's records as a licensed  
25 fictitious business name.

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PRAYER

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 the licenses and/or license rights of Respondents DISCREET CAPITAL, INC., MICHAEL HAMILTON CAMP, and ROBERT LINDSAY BROWN under the Real Estate Law, for the costs of investigation and enforcement as permitted by law, for the cost of the audit, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at San Diego, California this 1<sup>st</sup> day of July, 2021.

  
William Pak for  
Veronica Kilpatrick

Veronica Kilpatrick  
Supervising Special Investigator

cc: DISCREET CAPITAL, INC.  
MICHAEL HAMILTON CAMP  
ROBERT LINDSAY BROWN  
Maria Suarez  
Sacto.  
Audits – Zaky Wanis

1 Kevin H. Sun, Counsel (SBN 276539)  
2 Department of Real Estate  
3 320 West 4th Street, Suite 350  
4 Los Angeles, California 90013-1105  
5 Telephone: (213) 576-6982  
6 Fax: (213) 576-6917  
7 Email: Kevin.Sun@dre.ca.gov  
8 *Attorney for Complainant*

**FILED**

**APR 27 2021**

**DEPT. OF REAL ESTATE**

By 

9 BEFORE THE DEPARTMENT OF REAL ESTATE  
10 STATE OF CALIFORNIA

11 \* \* \*

12 In the Matter of the Accusation of ) No. H-41983 LA  
13 DISCREET CAPITAL, INC., )  
14 and MICHAEL HAMILTON CAMP, individually ) ACCUSATION  
15 and as designated officer of Discreet Capital, Inc., )  
16 and ROBERT LINDSAY BROWN, )  
17 Respondents. )

18 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the  
19 State of California, for cause of Accusation against DISCREET CAPITAL, INC., MICHAEL  
20 HAMILTON CAMP, and ROBERT LINDSAY BROWN (collectively "Respondents") alleges  
21 as follows:

22 1.

23 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the  
24 State of California, makes this Accusation in her official capacity.

25 2.

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

ACCUSATION

1 LICENSE HISTORY

2 (DISCREET CAPITAL, INC.)

3 3.

4 (a) Respondent DISCREET CAPITAL, INC. ("DCI") is presently licensed  
5 and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the California  
6 Business and Professions Code, as a real estate corporation, Department of Real Estate<sup>1</sup>  
7 ("Department") license ID 01942513.

8 (b) The Department originally issued DCI's corporate license on October 3,  
9 2013. DCI's license is scheduled to expire on October 2, 2021, unless renewed.

10 (c) According to the Department's records to date, DCI's main office address is  
11 41700 Ivy Street, Ste C, Murrieta, CA 92562.

12 (d) According to the Department's records to date, DCI employs 31 salespersons  
13 under its real estate license.

14 (e) According to the Department's records to date, DCI maintains authorized  
15 fictitious business names of "Drive Real Estate" and "Roots Realty Group".

16 (MICHAEL HAMILTON CAMP)

17 4.

18 (a) Respondent MICHAEL HAMILTON CAMP ("CAMP") is presently licensed  
19 under the Code, as a real estate broker, Department license ID 01714600.

20 (b) The Department originally issued CAMP's broker license on November 16,  
21 2009. CAMP's license is scheduled to expire on November 15, 2021, unless renewed.

22 (c) CAMP is the designated officer for DCI. His designation is scheduled to  
23 expire on October 2, 2021, unless renewed. As designated officer, CAMP is responsible for the  
24 supervision of the activities conducted on behalf of DCI by its officers, agents, real estate  
25 licensees, and employees pursuant to Section 10159.2 of the Code.

26  
27 <sup>1</sup> Between July 1, 2013 and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate under the Department of Consumer Affairs.

1 (d) On November 6, 2018, the Department issued Respondent a Mortgage Loan  
2 Originator ("MLO") license endorsement, National Mortgage Licensing System and Registry  
3 ("NMLS") No. 1627613. Respondent's MLO license endorsement is scheduled to expire in or  
4 about 2021.

5 (ROBERT LINDSAY BROWN)

6 5.

7 (a) Respondent ROBERT LINDSAY BROWN ("BROWN") is presently  
8 licensed under the Code, as a real estate salesperson, Department license ID 0083489.

9 (b) The Department originally issued BROWN's salesperson license on or about  
10 August 9, 1985. BROWN's license is scheduled to expire on July 7, 2024, unless renewed.

11 (c) According to the Department's records to date, from October 17, 2018  
12 through March 16, 2020, BROWN was employed by DCI as a salesperson.

13 6.

14 At all times relevant herein Respondents were engaged in the business of, acted  
15 in the capacity of, advertised or assumed to act as a real estate corporation, within the meaning  
16 of Section 10131(a) and (b) of the Code. Respondents' activities included the leasing or renting  
17 of real property and the collection of rents and security deposits for real property on behalf of  
18 others for compensation or in expectation of compensation.

19 (AUDIT SD200008)

20 7.

21 On or about December 28, 2020, the Department completed an audit  
22 examination of the books and records of DCI pertaining to the real estate activities described in  
23 Paragraph 6 above. The audit examination covered the period of time from November 1, 2018,  
24 through March 16, 2020 ("audit period"). The primary purpose of the examination was to  
25 determine whether Respondents conducted real estate activities in accordance with the Real  
26 Estate Law. The audit examination revealed violations of the Code and the Regulations as set  
27 forth in the following paragraphs, and more fully discussed in Audit No. SD200008, and the

1 exhibits and work papers attached to said audit report.

2 8.

3 At all times mentioned herein, and in connection with the property management  
4 activities described in Paragraph 6, above, BROWN, for DCI, accepted or received funds,  
5 including funds in trust ("trust funds") from or on behalf of actual or prospective parties to  
6 transactions handled by Respondents and thereafter made deposits and/or disbursements of such  
7 funds. According to the documents provided, DCI maintained 1 bank account for handling of  
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9 management activities.

10 The bank account is as follows:

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15 Signatories: Robert L Brown, Nicholas Brown

16 Signatures Required: One

17 Purpose: BA 1 was maintained to handle trust funds for DCI's property  
18 management activities for multiple beneficiaries.

19 Violations of the Real Estate Law

20 9.

21 The audit examination revealed violations of the Code and the Regulations, as  
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23 and the exhibits and work papers attached to the audit report:

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26 From November 1, 2018 to March 16, 2020, BROWN accepted trust funds from  
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1 deliver said trust funds to DCI, CAMP, and/or deposit trust funds into DCI's trust fund bank  
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3 with West Coast Property Managers.

4 **(b) Trust Fund Handling For Multiple Beneficiaries (Code section 10145**  
5 **and Regulations section 2832.1).**

6 Based on an examination of BA 1's records, there was a minimum trust fund  
7 shortage of \$1,945.47 as of March 16, 2020 in violation of Code section 10145 and Regulations  
8 section 2832.1. There is no evidence that Respondents were given written consent from the  
9 owners of the trust funds to allow Respondents to reduce the balance of the funds in BA 1 to an  
10 amount less than the aggregate trust fund liabilities of DCI to all owners of the trust funds.

11 **(c) Trust Fund Records to be Maintained (Code section 10145 and**  
12 **Regulations section 2831).** Respondents failed to maintain complete and accurate columnar  
13 record for all trust funds received and disbursed (control record) for BA 1, which was used for  
14 property management activities during the audit period in violation of Code section 10145 and  
15 Regulations section 2831. The control record maintained by Respondents had inaccurate daily  
16 balances of trust fund, missing entries, and was not in chronological order.

17 **(d) Separate Records for Each Beneficiary (Code section 10145 and**  
18 **Regulations section 2831.1).** Respondents failed to maintain complete and accurate separate  
19 records for each beneficiary or transaction of all trust fund receipts and disbursements for BA 1  
20 in connection with DCI's property management activities during the audit period in violation of  
21 Code section 10145 and Regulations section 2831.1. The separate records maintained by  
22 Respondents had inaccurate daily balances of trust fund, missing entries, and was not in  
23 chronological order.

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1                   (e) Trust Account Reconciliation (Code section 10145 and Regulations  
2 section 2831.2). During the audit period, DCI did not perform and maintain a complete and  
3 accurate monthly reconciliation of the balance of all separate beneficiary and/or transaction  
4 records to the balance of the records of all trust funds received and disbursed for BA 1 in  
5 violation of Code section 10145 and Regulations section 2831.2.

6                   (f) Trust Fund Handling/Account Designation (Code section 10145 and  
7 Regulations section 2832). Based on an examination of BA 1's records, BA 1 was not set up in  
8 the name of DCI or its fictitious business name "Drive Real Estate" as trustee. BA 1 was set up  
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11                   (g) Trust Account Withdrawal (Code section 10145 and Regulations section  
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13 a written authorization on file to allow BROWN to sign on and make withdrawals from BA 1.  
14 BA 1's bank signature card contained the signatory Nicholas Brown (non-employee of DCI,  
15 non-licensee), who was allowed to sign and make withdrawals from BA 1.

16                   (h) Commingling/Excess Broker's Funds Held in Bank Account that  
17 Handled Trust Funds (Code sections 10145 and 10176(e) and Regulations section  
18 2835(a)). DCI kept more than \$200 of its own funds in BA 1. As of March 16, 2020, DCI had a  
19 balance of \$289.24 of its own funds in BA 1.

20                   (i) Use of Unlicensed Fictitious Name (Code section 10159.5 and Regulations  
21 section 2731). During the audit period, DCI used the unlicensed fictitious business names  
22 "West Coast Property Managers" and "West Coast Management" in connection with the  
23 property management activities without first obtaining authorization from the Department.  
24 These fictitious business names do not show up in the Department's records as a licensed  
25 fictitious business name.

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1 (j) Branch Offices/Business and Mailing Addresses (Code section 10162  
2 and Regulations section 2715). Respondents failed to inform the Department of their use of  
3 the branch offices (1) 31534 Railroad Canyon Road, Suite A, Canyon Lake, CA 92587 and (2)  
4 30485 Sparkle Dr., Canyon Lake, CA 92587 in a timely manner. Respondents conducted real  
5 estate activity at both addresses without first registering them as Respondents' branch office  
6 addresses.

7 (k) Secret Profit or Undisclosed Compensation (Code section 10176(g)). Cal  
8 Western Services, an affiliated company with DCI, provided repairs and maintenance services  
9 to DCI's property owners. CWS is a Wyoming Corporation and BROWN is the 100%  
10 shareholder. DCI did not disclose in writing its affiliation with CWS to clients in most of the  
11 property management agreements.

12 (l) Responsibility of Corporate Office in Charge/Broker Supervision (Code  
13 sections 10159.2 and Regulations section 2725). Based on the violations in Paragraphs 9 (a)-  
14 (k) above, Respondent CAMP failed to exercise adequate supervision and control over  
15 Respondent DCI's property management activities in violation of Code section 10159.2.  
16 Respondent CAMP failed to provide established policies, rules, procedures, and systems to  
17 review, oversee, inspect, and manage transactions requiring a real estate license and the  
18 handling of trust funds in violation of Regulations section 2725.

19 Additional Violations of the Real Estate Law

20 10.

21 The overall conduct of Respondents violates the Real Estate Law and constitutes  
22 cause for the suspension or revocation of their real estate license and license rights under the  
23 provisions of **Code Section 10177(g)** for negligence and **Code Section 10177(d)** for willful  
24 disregard of the Real Estate Law.

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1 11.

2 Each of the foregoing violations in Paragraphs 9 (a)-(l) above constitute cause  
3 for the suspension or revocation of the real estate license and/or license rights of Respondents  
4 under the provisions of Code sections 10177(d), 10177(g), and 10177(h) (as to CAMP).

5 COSTS

6 (AUDIT COSTS)

7 12.

8 Section 10148(b) of the Code, provides, in pertinent part, that the Real Estate  
9 Commissioner shall charge a real estate broker for the costs of any audit if the Commissioner  
10 has found in a final decision, following a disciplinary hearing, that the broker has violated  
11 Section 10145 of the Code or a regulation or rule of the Commissioner interpreting said Code  
12 section.

13 (INVESTIGATION AND ENFORCEMENT COSTS)

14 13.

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

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1 PRAYER

2 WHEREFORE, Complainant prays that a hearing be conducted on the  
3 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing  
4 disciplinary action against all the licenses and/or license rights of Respondents DISCREET  
5 CAPITAL, INC., MICHAEL HAMILTON CAMP, and ROBERT LINDSAY BROWN under  
6 the Real Estate Law, for the costs of investigation and enforcement as permitted by law, for the  
7 cost of the audit, and for such other and further relief as may be proper under other applicable  
8 provisions of law.

9  
10 Dated at San Diego, California this 19 day of April, 2021.

11  
12  
13 V. Kilpatrick  
14 Veronica Kilpatrick  
15 Supervising Special Investigator

16  
17 cc: DISCREET CAPITAL, INC.  
18 MICHAEL HAMILTON CAMP  
19 ROBERT LINDSAY BROWN  
20 Maria Suarez  
21 Sacto.  
22 Audits – Zaky Wanis  
23  
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26  
27