

**FILED**

**MAR 15 2024**

**DEPT. OF REAL ESTATE**

By: 

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9 BEFORE THE DEPARTMENT OF REAL ESTATE  
10 STATE OF CALIFORNIA

11 \* \* \*

12 In the Matter of the Accusation of ) No. H-42837 LA  
13 THONG DUY VU, ) ACCUSATION  
14 Respondent. )  
15 \_\_\_\_\_ )

16 The Complainant, Jason Parson, a Supervising Special Investigator of the State  
17 of California, for cause of Accusation against THONG DUY VU (“Respondent”), alleges as  
18 follows:

19 1.

20 The Complainant, Jason Parson, a Supervising Special Investigator of the State  
21 of California, makes this Accusation in his official capacity.

22 2.

23 Respondent presently has license rights under the Real Estate Law, Part 1 of  
24 Division 4 of the California Business and Professions Code (“Code”), as a real estate  
25 salesperson (License ID 01971197). Respondent’s license is scheduled to expire on June 9,  
26 2027, unless renewed. Respondent has an approved MLO endorsement, NMLS No. 1600673.  
27 The MLO license endorsement is set to expire on December 31, 2024, unless renewed.

1 FIRST CAUSE OF ACCUSATION

2 (CRIMINAL CONVICTION)

3 3.

4 On or about September 29, 2022, in the Superior Court of California, County of  
5 Orange, Case No. 20WM03702, Respondent was convicted on a plea of guilty as to Count 1:  
6 violation of Vehicle Code section 23152(a) (driving under the influence of alcohol), a  
7 misdemeanor with an admission of allegation of Vehicle Code section 23577(a)(1) (refusal to  
8 submit to a peace officer's request for submission to, and willfully failed to complete, a breath  
9 and urine test); Count 2: violation of Vehicle Code section 23152(b) (driving under the  
10 influence of alcohol of 0.08% or more), a misdemeanor with an admission of allegation of  
11 Vehicle Code section 23577(a)(1) (refusal to submit to a peace officer's request for submission  
12 to, and willfully failed to complete, a breath and urine test); and Count 3: violation of Vehicle  
13 Code section 20002(a) (hit and run with property damage), a misdemeanor. As to Count 2, the  
14 Court stayed the sentence pursuant to Penal Code section 654. As to Count 3, the sentence was  
15 suspended. As to Count 1, Respondent was placed on informal probation for three (3) years, on  
16 certain terms and conditions, including, in part, serving thirty (30) days in Orange County Jail,  
17 with thirty (30) days of jail imposed pending completion of fifteen (15) days of Cal Trans/  
18 Physical Labor, completion of a nine (9) month Level 2 First Offender Alcohol Program,  
19 completion of Victim Impact Counseling, and payment of fees and fines.

20 4.

21 The convictions, as described in Paragraph 3, bear a substantial relationship  
22 under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications,  
23 functions or duties of a real estate licensee.

24 5.

25 The crimes of which Respondent was convicted, as described in Paragraph 3  
26 above, constitute cause under Sections 490 and 10177(b) of the Code for the suspension or  
27 revocation of the license and license rights of Respondent under the Real Estate Law.

ACCUSATION

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**SECOND CAUSE OF ACCUSATION**

**(FAILURE TO REPORT CONVICTIONS)**

6.

Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, “the conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any felony or misdemeanor” to the Department within thirty (30) days of the conviction.

Respondent failed to report in writing to the Department the convictions described in Paragraph 3 above, within thirty (30) days of the conviction date.

7.

Respondent’s failure to timely report the convictions constitute cause under Section 10186.2 of the Code for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

**(COSTS OF INVESTIGATION AND ENFORCEMENT)**

8.

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 of Real Estate, 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 the investigation and enforcement of the case.

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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 license rights of Respondent THONG DUY VU under the Real Estate Law, for the costs of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California this 7th day of March, 2024.



Jason Parson  
Supervising Special Investigator

cc: THONG DUY VU  
Mike M. Nguyen  
Jason Parson  
Sacto.