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FILED

JUN 04 2024

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-42837 LA
13 THONG DUY VU,) FIRST AMENDED
14 Respondent.) ACCUSATION
15)

16 This Accusation amends the Accusation filed on March 15, 2024. The
17 Complainant, Jason Parson, a Supervising Special Investigator of the State of California, for
18 cause of Accusation of THONG DUY VU ("Respondent"), alleges as 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 LICENSE HISTORY

23 2.

24 a. Respondent is presently licensed and/or has license rights under the Real
25 Estate Law, Part 1 of Division 4 of the California Business and Professions Code ("Code"), as a
26 real estate salesperson with Department of Real Estate ("Department") license ID 01971197.
27 Respondent's real estate salesperson license is set to expire on June 9, 2027, unless renewed.

1 4.

2 The conviction, as described in Paragraph 3 above, bears a substantial
3 relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations
4 (“Regulations”) to the qualifications, functions or duties of a real estate licensee.

5 5.

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

9 FAILURE TO REPORT CONVICTION

10 6.

11 Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, “the
12 conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any
13 felony or misdemeanor” to the Department of Real Estate (“Department”) within thirty (30)
14 days of the conviction. Respondent failed to report in writing to the Department the conviction
15 described in Paragraph 3 above, within thirty (30) days of the conviction date.

16 7.

17 Respondent’s failure to timely report the conviction described in Paragraph 3
18 above constitutes cause under Section 10186.2 of the Code for the suspension or revocation of
19 the license and license rights of Respondent under the Real Estate Law.

20 IN AGGRAVATION

21 (PRIOR CONVICTIONS)

22 8.

23 On or about June 10, 2013, in the Superior Court of California, County of
24 Orange, Case No. 13WM02939, Respondent was convicted, upon a guilty plea, for violating
25 Penal Code section 594(a)/(b)(1) (vandalism – damage \$400 or more), a misdemeanor. The
26 court suspended the imposition of sentence and placed Respondent on informal probation for
27 three (3) years upon certain terms and conditions, including completion of 25 days of Cal

1 Trans, and payment of restitution, fines and fees.

2 9.

3 On or about June 27, 2007, in the Superior Court of California, County of
4 Orange, Case No. 07HM02531, Respondent was convicted, upon a guilty plea, for violating
5 Vehicle Code section 23152(b) (driving under influence with 0.07% BAC or more), a
6 misdemeanor. The court suspended the imposition of sentence and placed Respondent on
7 summary probation for three (3) years upon certain terms and conditions, including completion
8 of a 3-month Level 1 First Offender Alcohol Program, completion of MADD Victim Impact
9 Panel, and payment of fines and fees.

10 COSTS OF INVESTIGATION AND ENFORCEMENT

11 10.

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

17 11.

18 These proceedings are brought under the provisions of Section 10100, Division
19 4 of the Business and Professions Code of the State of California and Sections 11500 through
20 11528 of the California Government Code.

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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 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, on June 4 _____, 2024.



Jason Parson
Supervising Special Investigator

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