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FILED
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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-42858 LA
13 SEAN KHUSHWANT SINGH,) ACCUSATION
14 Respondent.)
15 _____)

16 The Complainant, Ray G. Dagnino, a Supervising Special Investigator of the State of
17 California, for cause of Accusation against SEAN KHUSHWANT SINGH, a.k.a. "Khushwant
18 Singh" ("Respondent"), alleges as follows:

19 1.

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

22 2.

23 Respondent presently has license rights under the Real Estate Law, Part 1 of Division 4
24 of the California Business and Professions Code ("Code"), as a real estate broker (License ID
25 No. 01060759). Respondent's real estate broker license will expire on January 31, 2026, unless
26 renewed.

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(DISCIPLINARY ACTION)

3.

a. On or about November 17, 2021, in the Supreme Court of the State of California, Case No. S270270, pursuant to the California State Bar Court ("State Bar Court") Case No. SBC-20-O-30861-DGS, Respondent was suspended from practice of law in California for two (2) years. The execution of said suspension was stayed, and Respondent was placed on probation for two (2) years subject to certain terms and conditions.

Said terms and conditions included, in part, the following:

- (1) Suspension from the practice of law for the first ninety (90) days of probation;
- (2) Complying with other conditions of probation recommended by the Hearing Department of the State Bar Court in its Order Approving Stipulation filed on June 21, 2021;
- (3) Providing proof that Respondent took and passed the Multistate Professional Responsibility Examination as recommended by the Hearing Department in its Order Approving Stipulation filed on June 21, 2021;
- (4) Complying with California Rules of Court, rules 9.20(a) and 9.20(c) within 30 and 40 calendar days, respectively, after the effective date of November 17, 2021; and
- (5) At the expiration of the probation period, if Respondent has complied with all conditions of probation, the period of stayed suspension will be satisfied and the suspension will be terminated.

b. According to the Stipulation Re Facts, Conclusions of Law and Disposition and Order Approving Actual Suspension filed on June 21, 2021, in Case Nos. SBC-20-O-30861-DGS [OCTC Case Nos. 18-O-12967, 19-O-28259, and 19-O-29490], Respondent was subject to disciplinary action for violating multiple Code sections and the California Rules of Professional Conduct ("Rules of Professional Conduct"). Said violations included the

1 following:

2 (1) In OCTC Case No. 19-O-28259:

- 3 • Former Rules of Professional Conduct, rule 3-110(A) (failure to perform
- 4 with competence); and
- 5 • Former Rules of Professional Conduct, rule 3-700(D)(2) (failure to
- 6 refund, upon termination, any part of a fee paid in advance that has not
- 7 been earned).

8 (2) In OCTC Case No. 19-O-029490:

- 9 • Rules of Professional Conduct, rule 1.15(a) (failure to deposit advanced
- 10 fees into a client trust account); and
- 11 • Rules of Professional Conduct, rule 1.16(e)(2) (failure to promptly
- 12 refund, upon termination, any part of a fee or expense paid in advance
- 13 that has not been earned or incurred).

14 4.

15 The disciplinary action, as described in Paragraph 3 above, constitutes cause under
16 Code section 10177(f) for the suspension or revocation of the license and license rights of
17 Respondent under the Real Estate Law.

18 (FAILURE TO REPORT DISCIPLINARY ACTION)

19 5.

20 Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, “any
21 disciplinary action taken by another licensing entity or authority of this state” to the
22 Department of Real Estate (“Department”) within thirty (30) days of the disciplinary action.
23 Respondent failed to report in writing to the Department the disciplinary actions described in
24 Paragraph 5 above, within thirty (30) days of the disciplinary actions.

25 6.

26 Respondent’s failure to timely report the disciplinary actions described in Paragraph 5
27 above, within 30 days of the disciplinary actions, constitutes cause under Section 10186.2 of

1 the Code for the suspension or revocation of the license and license rights of Respondent under
2 the Real Estate Law.

3 (IN AGGRAVATION)

4 7.

5 a. On or about September 25, 2009, before the Supreme Court of California, Case No.
6 S174145, pursuant to California State Bar Court Case No. 06-O-10591, Respondent was
7 suspended from the practice of law for two (2) years. The execution of said suspension was
8 stayed, and Respondent was placed on probation for two (2) years subject to certain terms and
9 conditions. Said terms and conditions included actual suspension from the practice of law for
10 the first seventy-five (75) days of probation and the completion of ethics school and the
11 Multistate Professional Responsibility Examination.

12 b. Respondent was subject to disciplinary action for willfully violating Code section
13 6068(c) (failure to counsel or maintain actions that only appear as just), Code section 6106
14 (moral turpitude), and Rules of Professional Conduct, rule 3-110(A) (failure to act
15 competently). Respondent willfully violated said Code section and Rules of Professional
16 Conduct in connection with a malpractice lawsuit that Respondent filed against a doctor in the
17 Orange County Superior Court, Case No. 02CC01985, entitled Laura Wilhelm v. Stephen R.
18 Rakower, M.D.

19 8.

20 a. On or about March 15, 2002, before the Supreme Court of California, Case No.
21 S100875, pursuant to California State Bar Court Case No. 99-O-13355, Respondent was
22 suspended from the practice of law for one (1) year. The execution of said suspension was
23 stayed, and Respondent was placed on probation for two (2) years, on condition that
24 Respondent be actually suspended for the first two (2) months of probation. Said probation
25 was also subject to certain terms and conditions, which included completion of ethics school
26 and the Multistate Professional Responsibility Examination.

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1 b. Respondent was subject to disciplinary action for violating Rules of Professional
2 Conduct, rule 4-100(A) (failure to maintain the balance of trust funds in a client trust account)
3 and Rules of Professional Conduct, rule 4-100(B)(4) (failure to promptly make appropriate
4 disbursements to the IRS and client which the client is entitled to receive). Respondent
5 willfully violated said Rules of Professional Conduct in connection with a probate matter in the
6 Orange County Superior Court, Case No. A178216.

7 (COSTS OF INVESTIGATION AND ENFORCEMENT)

8 9.

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

14 10.

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

18 WHEREFORE, Complainant prays that a hearing be conducted on the allegations of
19 this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary
20 action against all the licenses and license rights of SEAN KHUSHWANT SINGH under the

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1 Real Estate Law, for the costs of investigation and enforcement as permitted by law, and for
2 such other and further relief as may be proper under other applicable provisions of law.

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4 Dated in Los Angeles, California, on April 25, 2024.

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Ray G. Dagnino

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Ray G. Dagnino
Supervising Special Investigator

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11 cc: SEAN KHUSHWANT SINGH
12 Ray G. Dagnino
13 Sacto.

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