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FILED

DEC 11 2024

DEPT. OF REAL ESTATE

By [REDACTED]

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8
9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-42975 LA
13 KEVIN LEE,) A C C U S A T I O N
14 Respondent.)
15 _____)

16 The Complainant, Ray Dagnino, a Supervising Special Investigator of the State
17 of California, for cause of Accusation against KEVIN LEE, ("Respondent"), is informed and
18 alleges as follows:

19 1.

20 The Complainant, Ray Dagnino, acting in his official capacity as a Supervising
21 Special Investigator of the State of California, makes this Accusation against KEVIN LEE.

22 2.

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

25 3.

26 Respondent KEVIN LEE presently has license rights under the Real Estate Law,
27 Part 1 of Division 4 of the Code as a real estate salesperson.

Accusation of KEVIN LEE

1 4.

2 Timing Realty Group Inc presently has license rights as a corporate real estate
3 broker.

4 5.

5 Seung Hoon Lee presently has license rights as a real estate broker.

6 6.

7 From August 11, 2020, to June 27, 2023, Timing Realty Group Inc was licensed
8 by the Department of Real Estate ("Department") as a corporate real estate broker by and
9 through Seung Hoon Lee, as the designated officer and broker responsible, pursuant to Code
10 section 10159.2, for supervising the activities requiring a real estate license conducted on
11 behalf of Timing Realty Group Inc, or by Timing Realty Group Inc's officers, agents and
12 employees.

13 7.

14 On or about March 18, 2020, Articles of Incorporation were filed with the
15 Secretary of State for Timing Realty Group Inc. Timing Realty Group Inc's agent for service
16 of process was listed as Respondent KEVIN LEE.

17 8.

18 On or about June 30, 2022, a Statement of Information was filed with the
19 Secretary of State for Timing Realty Group Inc. Timing Realty Group Inc's Chief Executive
20 Officer, director, and agent for service of process was listed as Respondent KEVIN LEE, and
21 Chief Financial Officer was listed as Seung H. Lee.

22 9.

23 On or about June 27, 2023, the Department received a Corporate Change
24 Application for Timing Realty Group Inc to transfer the designated officer title from Seung
25 Hoon Lee to Jong Soon Lee. Respondent KEVIN LEE forged the signature of Seung Hoon
26 Lee on the Corporate Change Application without the knowledge or permission of Seung Hoon
27 Lee.

Accusation of KEVIN LEE

10.

On or about June 30, 2023, a Statement of Information was filed with the Secretary of State for Timing Realty Group Inc. Timing Realty Group Inc's Chief Executive Officer, director, and agent for service of process was listed as Respondent KEVIN LEE, and Chief Financial Officer was listed as Seung H. Lee.

11.

On or about January 26, 2024, the Department requested from Respondent KEVIN LEE an explanation of who signed the Corporate Change Application on the behalf of Seung Hoon Lee.

12.

On or about January 29, 2024, Respondent KEVIN LEE admitted to the Department that KEVIN LEE forged the signature of Seung Hoon Lee on the Corporate Change Application without the knowledge or permission of Seung Hoon Lee.

13.

The conduct, acts, and omissions of Respondent KEVIN LEE, as described in Paragraphs 3 through 12 above, are in violation of Code section 10177(j) and constitute cause under Code section 10177(j) for the suspension or revocation of all the licenses, license endorsements, and license rights of KEVIN LEE.

14.

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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Accusation of KEVIN LEE

1 WHEREFORE, Complainant prays that a hearing be conducted on the
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3 disciplinary action against all the licenses, license endorsements, and license rights of
4 Respondent KEVIN LEE under the Real Estate Law, for the cost of investigation and
5 enforcement as permitted by law, and for such other and further relief as may be proper under
6 other applicable provisions of law.

7
8 Dated at Los Angeles, California
9 this 5th day of December , 2024

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11 
12 Ray Dagnino
13 Supervising Special Investigator

14 cc: KEVIN LEE
15 Ray Dagnino
16 Sacto.
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