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FILED

JUN 19 2025

DEPT. OF REAL ESTATE

By [redacted]

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Application of DANNY C. HSU, Respondent.	No. H-43128 LA STATEMENT OF ISSUES

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, acting in her official capacity, for Statement of Issues against DANNY C. HSU aka Danny Chin Hao Hsu ("Respondent") alleges as follows:

(APPLICATION)

1.

On or about May 31, 2024, Respondent made application to the Department of Real Estate of the State of California for a real estate salesperson license.

(CRIMINAL CONVICTIONS)

2.

On or about May 1, 2013, in the United States District Court, District of New Hampshire, case no. 12-CR-120-01-JL, Respondent was convicted of violating 18 U.S.C.

section 1341 (mail fraud) and 18 U.S.C. section 305(2) (misuse of shippers export declaration), both felonies. Respondent was sentenced to serve three (3) years of probation and pay various fines and fees. Said crimes bear a substantial relationship to the qualifications, functions, or duties of a real estate licensee under Section 2910, Title 10, Chapter 6, California Code of Regulations.

3.

The crimes of which Respondent was convicted as alleged above in Paragraph 2, above, constitute cause for denial of Respondent's application for a real estate license under California Business and Professions Code sections 475(a)(2), 480(a), 10177(b), and 10177(j).

4.

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

WHEREFORE, the Complainant prays that the above-entitled matter be set for hearing and, upon proof of the charges contained herein, that the Commissioner refuse to authorize the issuance of, and deny the issuance of, a real estate salesperson license to Respondent DANNY C. HSU and for such other and further relief as may be proper under other applicable provisions of law.

Dated at San Diego, California: June 18, 2025.

[redacted]

Veronica Kilpatrick
Supervising Special Investigator

cc: DANNY C. HSU
Veronica Kilpatrick
Ray Dagnino
Sacto