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1 Bureau of Real Estate  
2 320 W. 4<sup>th</sup> St., # 350  
3 Los Angeles, CA 90013

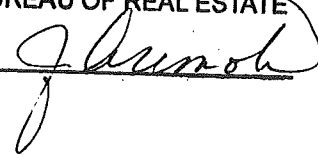
**FILED**

JUL 23 2014

4 (213) 576-6982

BUREAU OF REAL ESTATE

By



7 BEFORE THE BUREAU OF REAL ESTATE

8 STATE OF CALIFORNIA

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11	In the Matter of the Pre-Licensing	)	H- 39549 LA
12	Course Offerings of	)	
13	DENNIS REAL ESTATE COLLEGE,	)	
14	Sponsor.	)	

15 NOTICE OF WITHDRAWAL OF PRE-LICENSING  
16 COURSE OFFERING APPROVALS

17 TO: DENNIS REAL ESTATE COLLEGE  
18 Dennis Sungsoo Kim  
19 3030 W. Ball Road  
Anaheim, California 92804

- |    |                                 |               |
|----|---------------------------------|---------------|
| 20 | RE: 1. PROPERTY MANAGEMENT      | S0092-2488-06 |
| 21 | 2. REAL ESTATE ECONOMICS        | S0092-2487-06 |
| 22 | 3. REAL ESTATE APPRAISAL        | S0092-2486-06 |
| 23 | 4. REAL ESTATE FINANCE          | S0092-2485-06 |
| 24 | 5. LEGAL ASPECTS OF REAL ESTATE | S0092-2484-06 |
| 25 | 6. REAL ESTATE PRACTICE         | S0092-2483-06 |

NOTICE IS HEREBY GIVEN pursuant to the provisions of Section 3003 of Title 10, Chapter 6, California Code of Regulations ("Regulations") that the Real Estate Commissioner ("Commissioner") has caused an investigation to be made into the presentation of the pre-licensing course offerings identified in Paragraph 2, below, sponsored by DENNIS REAL ESTATE COLLEGE ("DENNIS") and previously approved by the Bureau of Real Estate of the State of California ("Bureau") as being equivalent in quality to courses offered by colleges and universities accredited by the Western Association of Schools and Colleges. On the basis of that investigation the Commissioner has determined that said courses no longer meet the statutory and regulatory standards for approval for pre-licensing course offerings approved pursuant to the provisions of Business and Professions Code ("Code") Section 10153.5, describing the constitution of "an equivalent course of study," and that approval of said courses should be and hereby is withdrawn for the reasons set forth below:

1. DENNIS is the sponsor of the pre-licensing course offerings identified in Paragraph 2, below. DENNIS is owned and controlled by Dennis Sunsoo Kim ("DSK").

2. The Bureau issued to DENNIS approval for the following pre-licensing course offerings pursuant to Code Sections 10151, 10153.2, and 10153.5 and Sections 3000 and 3002

1 of the Regulations:  
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3 <u>Course No.</u>	<u>Date</u>	<u>Course Title</u>
4 <u>Issued By DRE</u>	<u>Approved</u>	
5 S0092-2488-06	10/13/06	Property Management
6 S0092-2487-06	10/13/06	Real Estate Economics
7 S0092-2486-06	10/13/06	Real Estate Appraisal
8 S0092-2485-06	10/13/06	Real Estate Finance
9 S0092-2484-06	10/13/06	Legal Aspects of Real Estate
10 S0092-2483-06	10/13/06	Real Estate Practice
11 S0092-1911-03	09/23/03	Real Estate Principles

12  
13 These courses were applied for and approved to be taught as  
14 correspondence courses.

15           3. Code Section 10151(c) provides, in relevant part,  
16 that an applicant to the examination for a real estate  
17 salesperson license shall include evidence or certification of  
18 successful completion of specified courses at an accredited  
19 institution or, in the alternative, successful completion of an  
20 equivalent course of study as defined in Code Section 10153.5.

21           4. An applicant to take the examination for an  
22 original real estate broker license shall submit evidence of  
23 successful completion of specified courses at an accredited  
24 institution. (Code Section 10153.2) Under Section 10153.2(b)  
25 the Commissioner shall waive the requirements for which an  
26 applicant has successfully completed an equivalent course of  
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1 study as determined under Section 10153.5.

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3 4. Approval of the correspondence courses identified  
4 in Paragraph 2, above, was predicated upon DENNIS' compliance  
5 with Code Section 10153.5, and Sections 3000 and 3002 of the  
6 Regulations.

7 5. Section 3000 of the Regulations sets forth the  
8 criteria for approval of correspondence course offerings by the  
9 Bureau, including but not limited to the following  
10 requirements:

11 (a) A correspondence course shall consist of not less  
12 than 15 separate lesson assignments. (Section 3000(a)(1))

13 (b) A correspondence course must provide for a final  
14 examination administered and supervised by a person designated  
15 by the school for that purpose. The school shall send the final  
16 examination materials to the person so designated and the  
17 completed final examination shall be returned to the school by  
18 the person so designated. (Section 3000(a)(2)(B))

19 (c) The school shall maintain records for each  
20 student sufficient to allow for the preparation of a duplicate  
21 certificate upon request by a student. (Section 3000(a)(3))

22 (d) The school shall, within 15 days of a student's  
23 successful completion of the course, deliver a document to the  
24 student evidencing such completion. (Section 3000(a)(6))

25 (e) The school shall have an appropriate method of  
26 assessing student knowledge of the subject, such as, but not  
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1 limited to, multiple choice, essay or oral examinations.  
2 (Section 3000(a)(7))  
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4 6. On or about October 31, 2012, Bureau Special  
5 Investigator David Huang ("SI Huang") and California Department  
6 of Business Oversight Examiner Daniel Kim ("Examiner Kim") went  
7 to the office of DENNIS located at 3030 W. Ball Road, Anaheim,  
8 California, to conduct an undercover investigation of the  
9 school. Examiner Kim, using the alias "Thomas D. Park," posed  
10 as a prospective real estate salesperson license applicant  
11 interested in signing up for the required pre-licensing  
12 coursework.

13 Examiner Kim was greeted by DENNIS' owner, DSK, who  
14 advised Examiner Kim that the salesperson license required the  
15 completion of three specified courses. Examiner Kim then stated  
16 to DSK that he was already familiar with the subject matter  
17 contained in the courses, and wanted to obtain the course  
18 completion certificates immediately without having to actually  
19 attend the courses or take the final examinations. In response  
20 DSK told Examiner Kim that he could provide the required course  
21 completion certificates to him within one hour if Examiner Kim  
22 paid \$300 for the courses and an additional \$450 for a set of  
23 lecture DVDs. Examiner Kim agreed to the price, and gave DSK a  
24 cash deposit of \$500 toward the total price of \$750 with the  
25 agreement that Examiner Kim would return to pay the balance due  
26 after going to his bank. DSK wrote "\$500" on the back of one of  
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1 his business cards and gave it to Examiner Kim as a receipt.  
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3 Later on the same day Examiner Kim returned to the  
4 DENNIS school and gave DSK \$250 in cash as the balance due for  
5 the agreed course completion certificates and DVDs. DSK then  
6 handed Examiner Kim a three-page examination with corresponding  
7 answer sheets, and instructed Examiner Kim to answer the  
8 questions exactly as shown on the answer sheets. DSK explained  
9 to Examiner Kim that a certain number of the questions were  
10 designed to be answered incorrectly to make the examination  
11 results appear to be more "authentic." Examiner Kim completed  
12 the examinations in about fifteen (15) minutes using the  
13 provided answer sheets. DSK then printed out three course  
14 completion certificates bearing DENNIS' name and address, and  
15 handed them to Examiner Kim. The course certificates were for  
16 the following courses: Real Estate Principles, Real Estate  
17 Practice and Real Estate Economics.

18 The course completion certificates provided to  
19 Examiner Kim by DSK were each backdated to falsely represent  
20 that sufficient time had elapsed between Examiner Kim's  
21 registration for the courses and the final exam date to comply  
22 with the provisions of the Section 3000 of the Regulations.

23 7. The conduct described in Paragraph 6, above,  
24 insofar as it alleges the sale of course completion  
25 certificates without the bona-fide completion of coursework and  
26 the taking and passage of a final examination, constitutes the  
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1 failure by DENNIS and DSK to perform in accordance with the  
2 conditions to the approval of the courses identified in  
3 Paragraph 2, above, including those of Code Sections 10151,  
4 10153.2, and 10153.5 and Section 3000 of the Regulations, and  
5 is grounds for the withdrawal of approval of all pre-licensing  
6 course offerings identified in Paragraph 2, above, pursuant to  
7 the provisions of Code Section 10153.5 and Section 3003 of the  
8 Regulations.  
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10 8. Based on the foregoing, the Commissioner has  
11 determined that the courses identified in Paragraph 2, above,  
12 no longer meet the prescribed statutory and regulatory  
13 standards for approval under Code Section 10153.5 and Section  
14 3000 of the Regulations as being equivalent in quality to  
15 courses offered by colleges and universities accredited by the  
16 Western Association of Schools and Colleges, and therefore,  
17 approval of said courses should be and hereby is withdrawn  
18 pursuant to the provisions of Section 3003 of the Regulations.

19 9. Pursuant to the provisions of Section 3003 of the  
20 Regulations, the withdrawal of approval of all the course  
21 offerings identified in Paragraph 2, above, will be effective  
22 thirty (30) days after the notice of withdrawal is received by  
23 the sponsor unless the sponsor earlier files a written request  
24 for hearing on the withdrawal action. If the request for  
25 hearing is received by the Commissioner before 30 days after  
26 the date of receipt of notice of withdrawal by the sponsor, the  
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1 withdrawal of approval shall not be effective unless and until  
2 ordered by the Commissioner pursuant to findings and  
3 conclusions reached after hearing pursuant to Chapter 5  
4 (commencing with Section 11500) of Part 1 of Division 3 of  
5 Title 2 of the Government Code. The hearing shall be commenced  
6 within 30 days after receipt of the request for hearing unless  
7 continued to a later day by order of the Commissioner, or by  
8 agreement of the parties as provided in Section 3003 of the  
9 Regulations.

10 DATED

JUL 21 2014

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12 REAL ESTATE COMMISSIONER  
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15 **By: JEFFREY MASON**  
16 **Chief Deputy Commissioner**  
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24 cc: DENNIS REAL ESTATE COLLEGE  
25 DENNIS SUNGSOO KIM  
26 Shelly Wilson  
27 Sacto, Flag  
Sacto, Education