

1 Department of Real Estate
2 320 West Fourth Street, Ste. 350
3 Los Angeles, California 90013
4 Telephone: (213) 576-6982

FILED

DEC 02 2025

DEPT. OF REAL ESTATE

By- 

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7
8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 In the Matter of the Notice of Withdrawal of
11 Course Offering Approvals to:

12 REAL ESTATE TRAINERS, INC.,
13 Respondent.

DRE No. H-42855 LA

OAH No. 2025040100

STIPULATION AND AGREEMENT IN
SETTLEMENT AND ORDER

14
15 It is hereby stipulated by and between Respondent REAL ESTATE TRAINERS, INC.
16 ("Respondent"), represented by attorneys Miranda McCroskey and Justin Robinson, in this
17 matter, and the Complainant, acting by and through Lissete Garcia, Counsel for the Department
18 of Real Estate ("Department"), as follows for the purpose of settling and disposing the Notice of
19 Withdrawal of Course Offering Approvals ("Notice of Withdrawal") filed on October 15, 2024,
20 with Department Case No. H-42855 LA ("Notice of Withdrawal") in this matter:

21 1. All issues which were to be contested and all evidence which was to be presented
22 by Complainant and Respondent at a formal hearing on the Notice of Withdrawal, which hearing
23 was to be held in accordance with the provisions of the Administrative Procedure Act ("APA"),
24 shall instead and in place thereof be submitted on the basis of the provisions of this Stipulation

1 and Agreement in Settlement and Order ("Stipulation").

2 2. Respondent has received, read, and understands the Notice of Withdrawal filed by
3 the Department in this proceeding.

4 3. Respondent filed a Request for Hearing and Notice of Defense pursuant to
5 Regulations¹ 3003, 3010, and Section 11505 of the Government Code for the purpose of
6 requesting a hearing on the allegations in the Notice of Withdrawal. Respondent hereby freely
7 and voluntarily withdraws said Request for Hearing and Notice of Defense. Respondent
8 acknowledges and understands that by withdrawing said Request for Hearing and Notice of
9 Defense, Respondent will thereby waive Respondent's rights to require the Real Estate
10 Commissioner ("Commissioner") to prove the allegations in the Notice of Withdrawal at a
11 contested hearing held in accordance with the provisions of the APA and that Respondent will
12 waive other rights afforded to Respondent in connection with the hearing such as the right to
13 present evidence in defense of the allegations in the Notice of Withdrawal and the right to cross-
14 examine witnesses.

15 4. Respondent, pursuant to the limitations set forth below, hereby admits that the
16 Findings of Facts in the Notice of Withdrawal filed in this proceeding are true and correct and
17 the Commissioner shall not be required to provide further evidence to prove such allegations.

18 5. It is understood by the parties that the Commissioner may adopt the Stipulation
19 and Agreement as her decision in this matter thereby imposing the penalty and sanctions on the
20 **course offering approvals**, real estate licenses, and license rights of Respondent as set forth in
21 the below "Order." In the event that the Commissioner in her discretion does not adopt the
22 Stipulation and Agreement, it shall be void and of no effect, and the Respondent shall retain the

23
24 ¹ Unless otherwise noted, all references to the "Code" are to the California Business and Professions Code, all
references to the "Real Estate Law" are to Part 1 of Division 4 of the Code, and all references to "Regulations" are
to the Regulations of the Real Estate Commissioner, Title 10, Chapter 6, California Code of Regulations.

1 right to a hearing and proceeding on the Notice of Withdrawal under all provisions of the APA
2 and shall not be bound by any admission or waiver made herein.

3 7. The Order or any subsequent Order of the Real Estate Commissioner made
4 pursuant to this Stipulation and Agreement shall not constitute an estoppel, merger or bar to any
5 further administrative or civil proceedings by the Department of Real Estate with respect to any
6 matters which were not specifically alleged to be causes for withdrawal in this proceeding.

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8 DETERMINATION OF ISSUES

9 By reason of the foregoing stipulations and waivers and solely for the purpose of
10 settlement of the pending Notice of Withdrawal without a hearing, it is stipulated and agreed that
11 the following determination of issues shall be made:

12 1. The acts and omissions of Respondent and its instructors including, but not
13 limited to Lance Michael McHarg, as described in the Notice of Withdrawal violate Code
14 sections 123, 10153.01, subdivisions (a)(5) and (a)(6), 1015.3.1, Regulation 2763, subdivisions
15 (a)(4) and (a)(7), Regulation 3000, subdivision (a)(8), Regulation 3004, subdivision (d), and
16 Regulation 3006, subdivision (f), and constitute failure by Respondent to perform in accordance
17 with its representations and assurances that it would comply with the conditions of approval of
18 pre-licensing and continuing education courses, and are grounds for withdrawal of approval of
19 the courses identified below pursuant to the provisions of Code section 10153.5 and Regulations
20 3003 and 3010:

21 Pre-License Courses

22 Course Information

23 1 Real Estate Office Administration
24

1		<u>Course Information</u>
2	2	Real Estate Finance
3	3	Real Estate Appraisal
4	4	Property Management
5	5	Real Estate Principles
6	6	Real Estate Economics
7	7	Escrows
8	8	Legal Aspects of Real Estate
9	9	Real Estate Practice

10 Continuing Education Courses

11		<u>Course Information</u>
12	1	Recognizing Real Estate Red Flags
13	2	Agency
14	3	9 Hour Survey Course
15	4	Fair Housing
16	5	Investment Property Analysis
17	6	Real Estate Contracts, Procedures, and Practices
18	7	Trust Fund Handling
19	8	Disclosure Obligations in Real Estate Transactions
20	9	Risk Management
21	10	Ethics
22	11	Implicit Bias
23	12	Management and Supervision

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H-42855 LA ORDER

I.

All course approvals of Respondent REAL ESTATE TRAINERS, INC. are hereby publicly reprovod.

II.

Respondent REAL ESTATE TRAINERS, INC., shall pay, severally or jointly with Lance Michael McHarg, the total sum of \$60,000.00 for a monetary penalty, damages, and the Commissioner's reasonable costs of the investigation and litigation which led to this disciplinary action and for the disciplinary action in Case No. H-42990 LA. Said payment shall be in the form of a cashier's check made payable to the Department of Real Estate. **The payment must be delivered to the Department of Real Estate, Attn: Flag Section, 651 Bannan Street, Ste 504, Sacramento, CA 95811, within ninety (90) days from the effective date of this Decision and Order. The Payment should not be made until this Stipulation and Agreement has been approved by the Commissioner.**

If Respondent REAL ESTATE TRAINERS, INC. fails to satisfy this condition, any existing course approval(s) shall automatically be suspended and payment of said costs are a condition for any application(s) submitted by Respondent REAL ESTATE TRAINERS, INC. for any course approvals. The Commissioner shall afford Respondent the opportunity for a hearing pursuant to the Administrative Procedure Act to present such evidence that payment was timely made. The suspension shall remain in effect until payment is made in full or until a decision providing otherwise is adopted following a hearing held pursuant to this condition.

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1 III.

2 Pre-license Courses

3 Respondent shall within six (6) months from the effective date of this Decision and
4 Order, remove Lance Michael McHarg as an instructor, officer, director, agent, associate,
5 independent contractor, employee, or affiliate of REAL ESTATE TRAINERS, INC., submit
6 new Pre-Licensure Course Approval applications, and obtain approval for each course. If
7 Respondent fails to obtain a new certificate of approval for Respondent's Pre-License courses
8 within the six-month period, Respondent's existing course approval(s) shall automatically be
9 suspended until a new certificate of approval is obtained.


10 IV.

11 Continuing Education Courses

12 Respondent shall within six (6) months from the effective date of this Decision and
13 Order, remove Lance Michael McHarg as an instructor, officer, director, agent, associate,
14 independent contractor, employee, or affiliate of REAL ESTATE TRAINERS, INC., submit
15 new Continuing Education Course Approval applications, and obtain approval for each course.
16 If Respondent fails to obtain a new certificate of approval for Respondent's Continuing
17 Education courses within the six-month period, Respondent's existing course approval(s) shall
18 automatically be suspended until a new certificate of approval is obtained.

19 ***

20 DATED: 10/7/25


Lisette Garcia, Counsel
Department of Real Estate

22 * * *

23 EXECUTION OF THE STIPULATION

24 Respondent has read this Stipulation and its terms are understood by Respondent and is

1 agreeable and acceptable to Respondent. Respondent understands that Respondent is waiving
2 rights given to Respondent by the California APA (including, but not limited to, sections 11506,
3 11508, 11509, and 11513 of the Government Code), and Respondent willingly, intelligently, and
4 voluntarily waives those rights, including the right of requiring the Commissioner to prove the
5 allegations in the Notice of Withdrawal at a hearing at which Respondent would have the right to
6 cross-examine witnesses against Respondent and to present evidence in defense and mitigation
7 of the charges.

8 Respondent can signify acceptance and approval of the terms and conditions of this
9 Stipulation and Agreement by electronically e-mailing a copy of the signature pages, as actually
10 signed by Respondent, to the Department. Respondent agrees, acknowledges, and understands
11 that by electronically sending to the Department an electronic copy of Respondent's actual
12 signatures, as it appears on the Stipulation, that receipt of the emailed copy by the Department
13 shall be as binding on Respondent as if the Department had received the original signed
14 Stipulation. By signing this Stipulation, Respondent understands and agrees that Respondent
15 may not withdraw Respondent's agreement or seek to rescind the Stipulation prior to the time the
16 Commissioner considers and acts upon it or prior to the effective date of the Stipulation and
17 Order.


18 DATED: 10-06-2025


Respondent REAL ESTATE TRAINERS, INC.

19 By (Printed Name): 

20 Title: 

21
22 DATED: 10/06/2025


Justin Robinson or Miranda McCroskey, Attorney for
Respondent REAL ESTATE TRAINERS, INC., Approved
as to Form

The foregoing Stipulation and Agreement is hereby adopted as my Decision and Order
and shall become effective at 12 o'clock noon on JAN 02 2026.

IT IS SO ORDERED 1/25/2025, 2025.

CHIKA SUNQUIST
REAL ESTATE COMMISSIONER



By: Marcus L. McCarther
Chief Deputy Real Estate Commissioner