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FILED

DEC 02 2025

DEPT. OF REAL ESTATE

By \_\_\_\_\_

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

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

\* \* \*

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

DRE No. H-42855 LA

REAL ESTATE TRAINERS, INC.,  
Respondent.

OAH No. 2025040100

STIPULATION AND AGREEMENT IN  
SETTLEMENT AND ORDER

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

1. All issues which were to be contested and all evidence which was to be presented by Complainant and Respondent at a formal hearing on the Notice of Withdrawal, which hearing was to be held in accordance with the provisions of the Administrative Procedure Act (“APA”), 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 Regulations<sup>1</sup> 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

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<sup>1</sup> 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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## 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:

### Pre-License Courses

## Course Information

## 1 Real Estate Office Administration

1      Course Information

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      Course Information

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

24      ///

H-42855 LA ORDER

I.

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

II.

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

21   
Lissette 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

19                    [REDACTED]  
20                    [REDACTED]  
21                    [REDACTED]

22                    [REDACTED]  
23                    [REDACTED]  
24                    [REDACTED]

22 DATED: 10/06/2025

23                    [REDACTED]  
24                    [REDACTED]

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 11/25/2025, 2025.

CHIKA SUNQUIST  
REAL ESTATE COMMISSIONER

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By: Marcus L. McCarther  
Chief Deputy Real Estate Commissioner