

1 Bureau of Real Estate
2 P.O. Box 187007
3 Sacramento, CA 95818-7007
4 Telephone: (916) 227-0781

FILED

MAR 05 2018

BUREAU OF REAL ESTATE

By B. Nicholas

8 BEFORE THE BUREAU OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Pre-Licensing Course)
12 Offerings of:)
13 NOBLE FIELDS SCHOOL OF)
14 REAL ESTATE LLC,)
15 Sponsor.)

NO. H-12039 SF

STIPULATION AND
AGREEMENT

16 It is hereby stipulated by and between NOBLE FIELDS SCHOOL OF
17 REAL ESTATE LLC (Respondent), represented by Adam Slote, and the Complainant, acting
18 by and through Truly Sughrue, Counsel for the Bureau of Real Estate (Bureau), as follows for
19 the purpose of settling and disposing the Notice of Withdrawal of Pre-Licensing Course
20 Offering Approvals (Notice of Withdrawal) filed on November 29, 2017, in this matter:

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

26 2. Respondent has received, read, and understands the Notice of Withdrawal
27 filed by the Bureau in this proceeding.

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

11 4. Respondent, pursuant to the limitations set forth below, hereby admits that
12 the investigative findings in the Notice of Withdrawal filed in this proceeding are true and correct
13 and the Commissioner shall not be required to provide further evidence to prove such allegations.

14 5. It is understood by the parties that the Commissioner may adopt the
15 Stipulation and Agreement as his decision in this matter thereby imposing the penalty and
16 sanctions on the real estate licenses and license rights of Respondent as set forth in the below
17 "Order". In the event that the Commissioner in his discretion does not adopt the Stipulation and
18 Agreement, it shall be void and of no effect, and Respondent shall retain the right to a hearing
19 and proceeding on the Notice of Withdrawal under all the provisions of the APA and shall not be
20 bound by any admission or waiver made herein.

21 6. The Order or any subsequent Order of the Commissioner made pursuant to
22 this Stipulation and Agreement shall not constitute an estoppel, merger or bar to any further
23 administrative or civil proceedings by the Bureau with respect to any matters which were not
24 specifically alleged to be causes for withdrawal in this proceeding.

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1 * * *

2 DETERMINATION OF ISSUES

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

6 I

7 The acts and omissions of Respondent as described in the Notice of Withdrawal
8 violate Sections 3002(b), 3000(a)(2)(B), 3000(a)(6), 3000(a)(3), and 3000(a)(9) of the
9 Regulations, and constitute failure by Respondent to perform in accordance with its
10 representations and assurances that it would comply with the conditions of approval of the pre-
11 licensing courses and are grounds for withdrawal of approval of the courses identified in
12 Paragraph 2 of the Notice of Withdrawal.

13 * * *

14 ORDER

15 I

16 1) The correspondence courses identified in the table below no longer meet
17 the prescribed statutory and regulatory standards for approval under Section 10153.5 of the Code
18 and Section 3000 of the Regulations as being equivalent in quality to courses offered by colleges
19 and universities accredited by the Western Association of Schools and Colleges, and therefore
20 approval of the pre-licensing courses, via correspondence course, as identified in the table below
21 is withdrawn pursuant to Section 3003 of the Regulations.

22

Course No.	Approval Date	Course Title	Live/Correspondence Course
1276-91	3/5/1992	Escrows	Correspondence Course
1286-91	6/8/1992	Real Estate Practice	Correspondence Course
1317-91	3/16/1992	Legal Aspects of Real Estate	Correspondence Course
1318-91	3/16/1992	Property Management	Correspondence Course
1323-92	3/16/1992	Real Estate Finance	Correspondence Course
1516-94	12/7/1994	Real Estate Economics	Correspondence Course

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1600-96	10/7/1996	Real Estate Appraisal	Correspondence Course
3143-09	9/16/2009	Real Estate Principles	Correspondence Course

2) The Notice of Withdrawal as to the pre-licensing courses, via live education, as identified in the table below is rescinded, provided the term and condition described below is satisfied.

Course No.	Approval Date	Course Title	Live/Correspondence Course
0666-85	8/13/1985	Legal Aspects of Real Estate	Live Course
0680-85	9/12/1985	Real Estate Principles	Live Course
0682-85	9/24/1985	Real Estate Practice	Live Course
0683-85	9/24/1985	Property Management	Live Course
0688-85	9/24/1985	Real Estate Appraisal	Live Course
0690-85	9/24/1985	Real Estate Finance	Live Course
0749-86	8/18/1986	Escrows	Live Course
1902-02	2/7/2003	Mortgage Loan Brokering and Lending	Live Course

3) Respondent shall, within six (6) months from the effective date of this Decision and Order, submit new Pre-License Course Approval applications and obtain approval for each live course. If Respondent fails to obtain a new certificate of approval for a live course within the six month period, the existing course approval shall automatically be suspended until a new certificate of approval is obtained.

29-Jan-18

DATED

TRULY SUGHRUE
Counsel for Complainant

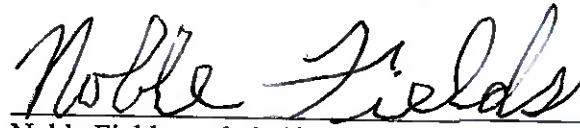
I have read the Stipulation and Agreement, discussed it with my counsel, and its terms are understood by me and are agreeable and acceptable to me. I understand that I am waiving rights given to me by the California Administrative Procedure Act, and I willingly, intelligently and voluntarily waive those rights, including the right of requiring the Commissioner to prove the allegations in the Notice of Withdrawals at a hearing at which I

1 would have the right to cross-examine witnesses against me and to present evidence in defense
2 and mitigation of the charges.

3 Respondent and Respondent's attorney further agree to send the original signed
4 Stipulation and Agreement by mail to the following address no later than one (1) week from the
5 date the Stipulation and Agreement is signed by Respondent and Respondent's attorney: *Bureau*
6 *of Real Estate, Legal Section, P.O. Box 137007, Sacramento, California 95813-7007.*

7 Respondent and Respondent's attorney understand and agree that if they fail to return the original
8 signed Stipulation and Agreement by the due date, Complainant retains the right to set this matter
9 for hearing.

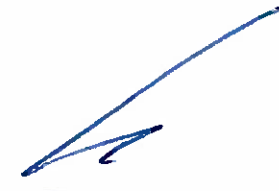
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11 1-17-2017
12 DATED


Noble Fields, on behalf of
NOBLE FIELDS SCHOOL OF REAL ESTATE
LLC
Respondent

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15 ***

16 *I have reviewed the Stipulation and Agreement as to form and content and have*
17 *advised my clients accordingly.*

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19
20 1-22-18
21 DATED


ADAM SROTE
Srote, Links & Boreman, LLP
Attorneys for Respondent

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The foregoing Stipulation and Agreement is hereby adopted as my Decision and
Order and shall become effective at 12 o'clock noon on MAR 26 2018

IT IS SO ORDERED 2/28/18

WAYNE S. BELL
REAL ESTATE COMMISSIONER



By: DANIEL J. SANDRI
Chief Deputy Commissioner

DECLARATION OF MAILING

**State of California
Bureau of Real Estate**

In the Matter of the Accusation of:

NOBLE FIELDS SCHOOL OF REAL ESTATE LLC

H-12039 SF

State of California, County of Sacramento

I am a citizen of the United States, over the age of eighteen years, and not a party to the within action; I am employed in the office of the Bureau of Real Estate of the State of California at 1651 Exposition Blvd., Sacramento, California 95815.

On March 5, 2018, I served the following documents:

- | | |
|--|--|
| <input checked="" type="checkbox"/> Stipulation and Agreement | <input checked="" type="checkbox"/> Letter to Respondent |
| <input checked="" type="checkbox"/> Copy of Sections 11521 & 11522 | |

in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

NOBLE FIELDS SCHOOL OF REAL ESTATE LLC
6121 MISSION STREET
DALY CITY, CA 94015

ADAM GLEN SLOTE
SLOTE LINKS & BOREMAN, LLP
ONE EMBARCADERO CENTER, SUITE 400
SAN FRANCISCO, CA 94111-3619

(Respondent)

(BY REGULAR & CERTIFIED MAIL)

(Respondent's Attorney)

(BY REGULAR MAIL)

- (By Mail)** I served the above document(s) on behalf of the Bureau of Real Estate by placing for collection and mailing following ordinary business practices, true copies to the addressed as shown above, on this date and at the place shown, in envelope(s) in the ordinary course of business. (As Noted)
- (By Certified Mail)** I served the above document(s) on behalf of the Bureau of Real Estate by placing for collection and mailing following ordinary business practices, true copies to the addressed as shown above, on this date and at the place shown, in envelope(s) in the ordinary course of business. (As Noted)

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on March 5, 2018, at Sacramento, California.



BROOKE NICHOLAS

1 BUREAU OF REAL ESTATE
2 P. O. Box 137007
3 Sacramento, CA 95813-7007

4 Telephone: (916) 263-8670

FILED

NOV 29 2017

BUREAU OF REAL ESTATE

By H. Deaz

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7
8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Continuing Education)
12 Course Offerings of:)
13 NOBLE FIELDS SCHOOL OF)
14 REAL ESTATE LLC,)
15 Sponsor.)

NO. H-12039 SF

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

18 TO: NOBLE FIELDS SCHOOL OF REAL ESTATE LLC
19 c/o Noble Lee Fields
20 6121 Mission Street
21 Daly City, CA 94015

RE: COURSES / COURSE NUMBERS

22 0666-85 Legal Aspects of Real Estate
23 0680-85 Real Estate Principles
24 0682-85 Real Estate Practice
25 0683-85 Property Management
26 0688-85 Real Estate Appraisal
27 0690-85 Real Estate Finance
0749-86 Escrows
1276-91 Escrows
1286-91 Real Estate Practice
1317-91 Legal Aspects of Real Estate
1318-91 Property Management

1	1323-92	Real Estate Finance
	1516-94	Real Estate Economics
2	1600-96	Real Estate Appraisal
	1902-02	Mortgage Loan Brokering and Lending
3	3143-09	Real Estate Principles

4 NOTICE IS HEREBY GIVEN pursuant to the provisions of Section 3003 of
5 Title 10, Chapter 6, California Code of Regulations (Regulations) that the Real Estate
6 Commissioner (Commissioner) has caused an investigation to be made into the presentation of
7 the pre-licensing course offerings identified in Paragraph 2, below. Said course offerings are
8 sponsored by NOBLE FIELDS SCHOOL OF REAL ESTATE LLC (NFSRE) and were
9 previously approved by the Bureau of Real Estate of the State of California (Bureau), as being
10 equivalent in quality to courses offered by colleges and universities accredited by the Western
11 Association of Schools and Colleges. On the basis of that investigation the Commissioner has
12 determined that said courses no longer meet the statutory and regulatory standards for approval
13 for pre-licensing course offerings approved pursuant to the provisions of Business and
14 Professions code (Code) Section 10153.5, describing the constitution of "an equivalent course
15 of study," and that approval of said courses should be and hereby are withdrawn for the reasons
16 set forth below:

17 SPONSOR

18 1. NFSRE is the sponsor, Bureau Sponsor No. 0170, of the pre-licensing
19 course offerings identified in Paragraph 2, below. NFSRE is owned and/or controlled by Noble
20 Lee Fields (Fields), a licensed real estate broker, Bureau License No. 00519204.

21 PRE-LICENSING COURSE OFFERINGS

22 2. The Bureau issued to NFSRE approval for the following pre-licensing
23 course offerings pursuant to Sections 10151, 10153.2, and 10153.5 of the Code and Sections
24 3000 and 3002 of the Regulations:

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27 ///

Course No.	Approval Date	Course Title	Live/Correspondence Course
0666-85	8/13/1985	Legal Aspects of Real Estate	Live Course
0680-85	9/12/1985	Real Estate Principles	Live Course
0682-85	9/24/1985	Real Estate Practice	Live Course
0683-85	9/24/1985	Property Management	Live Course
0688-85	9/24/1985	Real Estate Appraisal	Live Course
0690-85	9/24/1985	Real Estate Finance	Live Course
0749-86	8/18/1986	Escrows	Live Course
1276-91	3/5/1992	Escrows	Correspondence Course
1286-91	6/8/1992	Real Estate Practice	Correspondence Course
1317-91	3/16/1992	Legal Aspects of Real Estate	Correspondence Course
1318-91	3/16/1992	Property Management	Correspondence Course
1323-92	3/16/1992	Real Estate Finance	Correspondence Course
1516-94	12/7/1994	Real Estate Economics	Correspondence Course
1600-96	10/7/1996	Real Estate Appraisal	Correspondence Course
1902-02	2/7/2003	Mortgage Loan Brokering and Lending	Live Course
3143-09	9/16/2009	Real Estate Principles	Correspondence Course

COMPLIANCE REGULATIONS

3. Approval of the correspondence courses identified in Paragraph 2, above, was predicated upon NFSRE's compliance with Code Section 10153.5, and Sections 3000, 3002 and 3004 of the Regulations.

Section 10153.5 of the Code. "Equivalent Course of Study" – "Accredited Institution" Defined.

As used in Sections 10151, 10153.2, 10153.3, and 10153.4, "an equivalent course of study" consists of courses at a private vocational school that have been found by the commissioner, upon consideration of an application for approval, to be equivalent in quality to the real estate courses offered by the colleges and universities accredited by the Western Association of Schools and Colleges. As

1 used in Sections 10151, 10153.2, 10153.3, and 10153.4, "accredited institution"
2 shall mean a college or university that either:

3 (a) Is accredited by the Western Association of Schools and Colleges, or
4 by any other regional accrediting agency recognized by the United States
5 Department of Education.

6 (b) In the judgment of the commissioner, has a real estate curriculum
7 equivalent in quality to that of the institutions accredited pursuant to subdivision

8 Section 3000 of the Regulations. Equivalent Course of Study at Private
9 Vocational Schools.

10 (a) In making a determination under authority of section 10153.5 of the
11 Code as to whether a course of study at a private vocational school is equivalent
12 in quality to real estate courses offered by colleges and universities accredited by
13 the Western Association of Schools and Colleges, the commissioner shall
14 consider, but shall not be limited to the following criteria:

15 (1) An attended course must provide at least 45 periods of classroom
16 instruction, each of which shall be not less than 50 minutes duration. A
17 correspondence course shall consist of not less than 15 separate lesson
18 assignments.

19 (2)(A) An attended course must provide for a final examination
20 administered and supervised by the school in a classroom setting.

21 (B) A correspondence course must provide for a final examination
22 administered and supervised by a person designated by the school for that
23 purpose. The school shall send the final examination materials to the person so
24 designated and the completed final examination shall be returned to the school by
25 the person so designated.

26 (3) The school must provide instructors, instructional material and
27 classroom facilities adequate to achieve the objective of the course offered.

(4) The school shall maintain records for each student sufficient to allow
for the preparation of a duplicate certificate upon request by a student.

(5) The school shall not use advertising or other promotional devices that
are deceptive or misleading.

(6) The school shall, within 15 days of a student's successful completion
of the course, deliver a document to the student evidencing such completion. The
document shall contain the following information:

(A) Bureau of Real Estate course approval number.

(B) Name of student.

(C) Course title.

(D) Dates of course completion.

(E) Name and address of school.

The school may include such additional information in this document as it deems
necessary.

(7) The school shall have an appropriate method of assessing student
knowledge of the subject, such as, but not limited to, multiple choice, essay or
oral examinations.

(8) Instructors must have credentials issued by the Board of Governors of
the California Community Colleges or by a comparable California teacher-

1 credentialing agency or meet the qualifications established in Sections 53400 et
2 seq. of Title 5. The commissioner may approve instructors who in his or her
3 judgment meet the qualifications, or who otherwise evidence their teaching
4 qualifications by education or experience or a combination of the two. An
5 instructor shall not teach a course if the instructor:

6 (A) Does not satisfy the criteria in this subdivision.

7 (B) Has engaged in any violation of Article 24 (commencing with Section
8 3000) of these regulations or has engaged in conduct which would have warranted
9 the denial of an application for approval or withdrawal of approval of an
10 equivalent course of study.

11 (C) As a real estate licensee has had that license suspended, revoked or
12 restricted as a result of disciplinary action.

13 (D) Acted or conducted himself or herself in a manner which would have
14 warranted the denial of his or her application for a real estate license.

15 (9) Beginning on January 1, 2004, the school shall notify each student that
16 an evaluation form is available on the Bureau's internet website for on-line
17 evaluation of courses and instructors

18 Section 3002 of the Regulations. Application and Fee

19 (a) A person making application for approval by the commissioner of an
20 equivalent course of study within the meaning of Sections 10153.2, 10153.4 or
21 10153.5 of the Code shall make application on a form prescribed by the Bureau
22 and shall include therein such relevant information as the commissioner may
23 require. The application shall be accompanied by the appropriate fee as provided
24 in subdivision (c) hereof and include at least the following:

25 (1) The name, address and telephone number of the applicant.

26 (2) Summary of the course including:

27 (A) Type of course (resident lecture or correspondence/independent
study).

(B) Course title.

(C) Complete course outline or syllabus with time schedule indicating
total number of hours for course.

(D) Textbook(s) and student materials prescribed.

(E) Evidence of Private Vocational School approval or registration by the
Bureau for Private Postsecondary Education of the California Department of
Consumer Affairs if the sponsor is not otherwise exempt from the requirement for
such approval or registration or by the appropriate approval authority of the state
in which the school is located shall be included with the course application.

(b) Any material change to an approved equivalent course of study shall
be submitted by the school to the Bureau of Real Estate for approval prior to use.
A material change for purposes of this section is a deviation from an equivalent
course of study approved by the Bureau of Real Estate, including a change in
curriculum, course length, workbooks, texts or syllabi, but not including changes
designed exclusively to reflect recent changes in statutes, regulations or decisional
law.

(c) The fees for applications for approval of equivalent courses of study
under Sections 10153.2, 10153.3 and 10153.4 of the Code and for material

1 changes to previously approved courses shall be the fees prescribed in Section
2 10209 of the Code.

3 INVESTIGATIVE FINDINGS

4 4. On or about 1/6/91, NFSRE submitted a Pre-license Course Approval
5 Application (application) for Real Estate Practice as a correspondence course. In the
6 application NFSRE represented to use the textbook, California Real Estate Practice by Kathryn
7 Haupt, published in 1991, 5th edition. The mini-quizzes and final exams for the course were
8 based on the information in the textbook represented in the application.

9 5. On or about 12/18/91, NFSRE submitted an application for Legal Aspects
10 of Real Estate as a correspondence course. In the application NFSRE represented to use the
11 textbook, California Real Estate Law by Megan Dorsey and Erin Riley, published in 1991, 2nd
12 edition. The mini-quizzes and final exams for the course were based on the information in the
13 textbook represented in the application.

14 6. On 6/8/92 certificate number 1286-91 was issued to NFSRE approving
15 the Real Estate Practice correspondence course. A term and condition of approval was "That
16 the course will not be changed in any material manner from curriculum and standards reflected
17 in the application and request for approval." At no time, prior to use, has NFSRE notified the
18 Bureau of making any material changes to the course materials or textbook.

19 7. On 3/16/92 certificate number 1317-91 was issued to NFSRE approving
20 the Legal Aspects of Real Estate correspondence course. A term and condition of approval was
21 "That the course will not be changed in any material manner from curriculum and standards
22 reflected in the application and request for approval." On or about 2/7/11, NFSRE notified the
23 Bureau of using the textbook California Real Estate Law, 7th edition. No updated mini-quizzes
24 or final exams were provided to the Bureau.

25 8. On or about 4/20/16, Bureau Special Investigator Jenna B. (Jenna)
26 registered for the correspondence courses, Real Estate Practice (course #1286-91) and Legal
27 Aspects of Real Estate (course #1317-91), on NFSRE's website, www.noblefields.com. Upon

1 paying for the two courses no course information or information regarding the requirements of
2 the course was provided.

3 9. On or about 4/27/16, Jenna called NFSRE and spoke to Fields. Jenna
4 inquired about the status of the courses as she had not yet received anything. Fields provided
5 that she would get the materials out to Jenna.

6 10. On or about 4/29/16, Jenna received via US mail the textbook California
7 Real Estate Law, 8th edition. No course instructions, exams, or assignments were included. The
8 course material provided by NFSRE to Jenna was not the same material that was submitted,
9 reviewed, or approved by the Bureau for use during the course approval application in violation
10 Section 3002(b).

11 11. On or about 5/10/16, Jenna telephoned NFSRE and spoke to Fields.
12 Jenna informed Fields that she received the textbook for Legal Aspects of Real Estate but
13 nothing else. Fields informed her that she needed to have book for 18 days before taking the
14 test, and to email her once Jenna had finished reviewing the book and am ready for the test.
15 Jenna also asked for the Real Estate Practices textbook to be sent to her.

16 12. On or about 5/13/16, Jenna received a package via US mail. The package
17 included the textbook California Real Estate Practice, 8th edition, and chapter quizzes. The
18 chapter quizzes were for the 7th edition of California Real Estate Practice, and some of the
19 questions corresponded to a different chapter in the 8th edition of the textbook. The course
20 material provided by NFSRE to Jenna was not the same material that was submitted, reviewed,
21 or approved by the Bureau for use during the course approval application in violation Section
22 3002(b).

23 13. On or about 6/1/16, Jenna completed the quizzes and emailed them the
24 NFSRE. Jenna also emailed the names of three people, not related to her, who agreed to
25 administer the final examination.

26 14. On or about 6/13/16, Jenna telephoned NFSRE and spoke with Fields.
27 Fields provided that she would get the final examination sent out.

1 15. On or about 6/20/16, Jenna received the final examination via US Mail.
2 The exam was for California Real Estate Practice, 7th Edition. No instructions to the test
3 administrator or student were provided with the final examination. Jenna completed the
4 examination and emailed the answer sheet to NFSRE. The course material provided by NFSRE
5 was not the same material that was submitted, reviewed, or approved by the Bureau for use
6 during the course approval application in violation Section 3002(b) of the Regulations.
7 NFSRE's failure to send the final examination materials to the person designated to administer
8 the test, and to receive the completed examination by the person so designated is in violation of
9 Section 3000(a)(2)(B).

10 16. On or about 6/24/16, Jenna received an email from Fields indicating that
11 she had mailed Jenna the quizzes for Legal Aspects of Real Estate, and that Jenna had passed
12 the exam for Real Estate Practice.

13 17. On or about 6/20/16, Jenna received via US Mail the chapter quizzes for
14 Legal Aspects of Real Estate. The chapter quizzes were for the 7th edition of California Real
15 Estate Law, and some of the questions corresponded to a different chapter in the 8th edition of
16 the textbook. The package also contained an answer key for the quizzes. The course material
17 provided by NFSRE to Jenna was not the same material that was submitted, reviewed, or
18 approved by the Bureau for use during the course approval application in violation Section
19 3002(b) of the Regulations.

20 18. On or about 7/8/16, Jenna emailed Fields indicating that she was ready to
21 take the final examination and that Anne Jackson would administer the examination.

22 19. On 7/13/16, Fields emailed Anne Jackson asking her to monitor Jenna's
23 final exam for Legal Aspects of Real Estate. Anne Jackson agreed to be the test monitor.

24 20. On 7/22/16, Fields emailed Anne Jackson a copy of the "Real Estate Law
25 -7th Edition" Final Exam A. No instructions to the test administrator or student were provided
26 with the final examination. The course material provided by NFSRE was not the same material
27

1 that was submitted, reviewed, or approved by the Bureau for use during the course approval
2 application in violation Section 3002(b) of the Regulations.

3 21. On 7/25/16, Anne Jackson emailed Fields the completed answer sheet.
4 Anne Jackson was not required to complete a Certification of Test Administrator in violation of
5 Sections 3000(a)(2)(B) and 3002(b) of the Regulations.

6 22. On 7/25/16, Fields emailed Anne Jackson, Jenna's certificate of
7 completion for Real Estate Practices and Legal Aspects of Real Estate. NFSRE failed to deliver
8 to Jenna a certificate evidencing the successful completions of the course within 15 days in
9 violation of Section 3000(a)(6).

10 23. At no time was Jenna told that a course evaluation form can be found on
11 the Bureau's website in violation of Section 3000(a)(9) of the Regulations.

12 24. NFSRE did not provide adequate instructional material to achieve the
13 objective of the course offered in violation of Section 3000(a)(3), as general course information
14 and instructions were not provided.

15 GROUNDS FOR WITHDRAWAL OF APPROVAL

16 25. The facts described in Paragraphs 4 through 24, above, constitutes failure
17 by NFSRE to perform in accordance with its representations and assurances that it would
18 comply with the conditions of approval of the continuing education courses identified in
19 Paragraph 2, above, in violation of Section 10153.5 of the Code and Sections 3000 and 3002 of
20 the Regulations, and are grounds for the withdrawal and denial of approval of the continuing
21 education course offerings identified in Paragraph 2, above, under the provisions of Sections
22 3000(a)(2)(B), 3000(a)(3), 3000(a)(6), 3000(a)(9), and 3002(b) of the Regulations.

23 ORDER

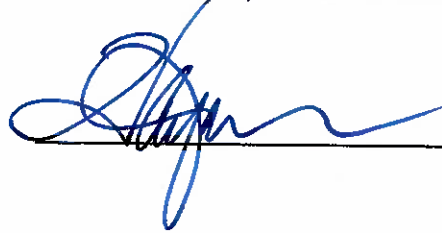
24 26. Based on the foregoing, the Commissioner has determined that the courses
25 identified in Paragraph 2, above, no longer meet the prescribed statutory and regulatory
26 standards for approval under Code Section 10153.5 and Section 3000 of the Regulations as being
27 equivalent in quality to courses offered by colleges and universities accredited by the Western

1 Association of Schools and Colleges, and therefore, approval of said courses should be and
2 hereby is withdrawn pursuant to the provisions of Section 3003 of the Regulations.

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

14
15 Dated: 11/27/2017
16

17 WAYNE S. BELL
18 REAL ESTATE COMMISSIONER

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BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Continuing Education)
Course Offerings of:)
)
NOBLE FIELDS SCHOOL OF)
REAL ESTATE LLC,)
_____)

NO. H-12039 SF

DECLARATION OF MAILING

STATE OF CALIFORNIA)
) ss.
COUNTY OF SACRAMENTO)

I am employed in the office of the Bureau of Real Estate of the State of California at 1651 Exposition Blvd., Sacramento, CA 95815.. I am over the age of eighteen years and not a party to the within action.

On November 29, 2017, I served the following document(s):

Notice of Withdrawal of Pre-Licensing Course Offering Approvals

in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

NOBLE FIELDS SCHOOL OF REAL ESTATE LLC.,
c/o BRETT S. LYTLER
6121 MISSION STREET
DALY CITY, CA 94015

SLOTE, LINKS & BOREMAN, LLP
Adam Slote, Attorney at Law
One Embarcadero Center, Suite 400
San Francisco, CA 94111
Via email adam@slotelaw.com

NOBLE FIELDS SCHOOL OF REAL ESTATE LLC.,
c/o BRETT S. LYTLER
2070 PIONEER COURT
SAN MATEO CA 94403

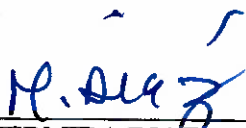
Attorney for Respondent

Respondent

(By Mail and E-mail) I served the above document(s) on behalf of the Bureau of Real Estate by placing for collection and mailing following ordinary business practices, true copies to the addressed as shown above, on this date and at the place shown, in envelope(s) in the ordinary course of business.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on November 29, 2017, at Sacramento, California.



HERMIDA DIAZ