

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

4 (213) 576-6982

FILED

FEB 06 2017

BUREAU OF REAL ESTATE

By 

7 BEFORE THE BUREAU OF REAL ESTATE

8 STATE OF CALIFORNIA

9 * * *

10
11 In the Matter of the Pre-Licensing) H-40513 LA
12 Course Offerings of)
13 UNITED EDUCATIONAL SERVICES,)
14 Sponsor.)
15)

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

18 TO: UNITED EDUCATIONAL SERVICES
19 Craig Alan Dubron
20 9137 Reseda Boulevard
21 Northridge, CA 91324

22 RE: 1. REAL ESTATE PRACTICE S0245-1524-94
23 2. ESCROWS S0245-1515-94
24 3. REAL ESTATE PRINCIPLES S0245-1471-94

25 NOTICE IS HEREBY GIVEN pursuant to the provisions of Section 3003 of
26 Title 10, Chapter 6, California Code of Regulations ("Regulations") that the Real Estate
27 Commissioner ("Commissioner") has caused an investigation to be made into the presentation

1 of the pre-licensing course offerings identified in Paragraph 2, below, sponsored by UNITED
2 EDUCATIONAL SERVICES (“UNITED”) and previously approved by the Bureau of Real
3 Estate of the State of California (“Bureau”) as being equivalent in quality to courses offered by
4 colleges and universities accredited by the Western Association of Schools and Colleges. On
5 the basis of that investigation the Commissioner has determined that said courses no longer
6 meet the statutory and regulatory standards for approval for pre-licensing course offerings
7 approved pursuant to the provisions of Business and Professions Code (“Code”) Section
8 10153.5, describing the constitution of “an equivalent course of study,” and that approval of
9 said courses should be and hereby is withdrawn for the reasons set forth below:
10

11 1. UNITED is the sponsor of the pre-licensing course offerings identified in
12 Paragraph 2, below. UNITED is owned and controlled by Craig Alan Dubron (“DUBRON”).

13 2. The Bureau issued to UNITED approval for the following pre-licensing
14 course offerings pursuant to Code Sections 10151, 10153.2, and 10153.5 and Sections 3000
15 and 3002 of the Regulations:

<u>Course No.</u>	<u>Date</u>	<u>Course Title</u>
<u>Issued By DRE</u>	<u>Approved</u>	
S0245-1524-94	10/27/94	Real Estate Practice
S0245-1515-94	9/7/94	Escrows
S045-1471-94	5/23/94	Real Estate Principles

16
17
18
19
20
21 These courses were applied for and approved to be taught as *correspondence courses*.

22 3. Code Section 10151(c) provides, in relevant part, that an applicant to the
23 examination for a real estate salesperson license shall include evidence or certification of
24 successful completion of specified courses at an accredited institution or, in the alternative,
25 successful completion of an equivalent course of study as defined in Code Section 10153.5.
26

1
2 The specified courses are as follows: "a three-semester unit course, or the
3 quarter equivalent thereof, or successful completion of an equivalent course of study as defined
4 in Section 10153.5 in *real estate principles* as well as the successful completion at an
5 accredited institution of a course in *real estate practice* and *one additional course set forth in*
6 *Section 10153.2*, other than real estate principles, real estate practice, advanced legal aspects of
7 real estate, advanced real estate finance, or advanced real estate appraisal.

8 4. An applicant to take the examination for an original real estate broker license
9 shall submit evidence of successful completion of a course in *real estate practice* along with
10 other specified courses at an accredited institution. (Code Section 10153.2) Under Section
11 10153.2(b) the Commissioner shall waive the requirements for which an applicant has
12 successfully completed an equivalent course of study as determined under Section 10153.5.

13 5. Approval of the correspondence courses identified in Paragraph 2, above,
14 was predicated upon UNITED's compliance with Code Section 10153.5, and Sections 3000,
15 3002 and 3004 of the Regulations.

16 6. Section 10153.5 provides, in relevant part, as follows:

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

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

25 (a) Is accredited by the Western Association of Schools and
26 Colleges, or by any other regional accrediting agency recognized by the United
27

1
2 States Department of Education.

3 (b) In the judgment of the commissioner, has a real estate
4 curriculum equivalent in quality to that of the institutions accredited pursuant to
5 subdivision (a).

6
7 7. Section 3000 of the Regulations sets forth the criteria for approval of live
8 course offerings by the Bureau, including but not limited to the following requirements:

9 (a) An attended course must provide at least 45 periods of classroom instruction,
10 each of which shall be not less than 50 minutes duration. (Section 3000(a)(1) of the
11 Regulations.)

12 (c) The school shall not use advertising or other promotional devices that are
13 deceptive or misleading. (Section 3000(a)(2)(5) of the Regulations.)

14 8. Section 3002 of the Regulations sets forth the criteria for application for
15 approval of an equivalent course of study which is comprised of the following requirements:

16 (a) A person making application for approval by the commissioner of an
17 equivalent course of study within the meaning of Sections 10153.2, 10153.4 or 10153.5 of the
18 Code shall make application on a form prescribed by the Department and shall include therein
19 such relevant information as the commissioner may require. At least the following must be
20 included in the application:

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

22 (2) Summary of the course including:

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

25 (B) Course title.

26 (C) Complete course outline or syllabus with time schedule indicating
27

1
2 total number of hours for course.

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

4 (E) Evidence of Private Vocational School approval or registration by
5 the Bureau for Private Postsecondary and Vocational Education of the
6 California Department of Consumer Affairs if the sponsor is not
7 otherwise exempt from the requirement for such approval or registration
8 or by the appropriate approval authority of the state in which the school
9 is located shall be included with the course application. (Section 3002(a)
10 of the Regulations.)

11 9. Section 3002(b) of the Regulations provides that any material change to an
12 approved equivalent course of study shall be submitted by the school for approval prior to use.
13 A material change is described as “a deviation from an equivalent course of study approved by
14 the [Bureau], including a change in curriculum, course length, workbooks, texts or syllabi, but
15 not including changes designed exclusively to reflect recent changes in statutes, regulations or
16 decisional law.” (Section 3002(b) of the Regulations.)

17 10. Section 3004 of the Regulations describes the standards for advertising or
18 promotional material with respect to an equivalent course of study as follows:

19 The use of advertising or promotional material by or on behalf of the
20 private vocational school or other sponsor of an equivalent course of study will
21 be considered by the commissioner to be deceptive or misleading if it does not
22 comply with the following standards:

23 (a) An advertisement shall clearly and conspicuously identify the entity
24 offering an equivalent course of study as a private vocational school or the
25 sponsor of a supervised course of study or other approved equivalent course of
26 study and shall include the name of the entity.

1
2 (b) Advertising which makes reference to courses of study approved by
3 the commissioner shall identify the specific course or courses that have been
4 approved by listing the Department's course approval number.

5 (c) No advertising or materials, including oral representations, promoting
6 approved equivalent courses shall contain language which implies or states,
7 directly or indirectly, that a course can be completed in less time than the
8 number of hours for which it is approved.

9 (d) No advertising or materials, including oral representation, shall
10 include false or misleading statements or representations.

11
12 11. DUBRON is a licensed real estate broker. As such he is required to comply
13 with the Bureau's continuing education requirements. In order to qualify for renewal of his real
14 estate license, DUBRON was required to prove successful completion of 45-hours of
15 continuing education courses, or the equivalent, during the preceding four-year period (Code
16 Section 10170.5).

17 12. On or about August 18, 2014, DUBRON submitted to the Bureau a petition
18 seeking to have his experience teaching *live* equivalency courses deemed to satisfy his
19 continuing education coursework obligation. The petition averred that DUBRON is the director
20 of UNITED and that for a period of five years he has been teaching live classes to students who
21 are taking their prerequisite courses for the salesperson licensing examination. The petition
22 states that the classes he teaches as live courses are California Real Estate Principles, California
23 Real Estate Practice and Escrow 1.

24 13. Included along with the foregoing petition is a copy of advertising
25 DUBRON states is used by UNITED in soliciting students for its live courses. According to
26 DUBRON's petition and the attached advertisement, the offered courses qualify an applicant
27

1 for the licensing examination. The courses for Real Estate Principles and Real Estate Practice
2 are advertised as being taught live in two classroom sessions of 2.5 hours each. The Escrow 1
3 class is taught in a single live 5-hour session. The total number of hours for each course is,
4 therefore, five hours in duration rather than the requisite “45 periods of classroom instruction
5 each of which is not less than 50 minutes in duration” as required for live courses by Section
6 3000(a)(1) of the Regulations.

7
8 14. The conduct described in Paragraph 13, above, constitutes the following:

9 a. A failure by UNITED and DUBRON to perform in accordance with the
10 conditions to the approval of the courses identified in Paragraph 2, above, including those of
11 Code Sections 10151, 10153.2, and 10153.5 and Sections 3000, 3002 and 3004 of the
12 Regulations;

13 b. A misleading advertisement in that it suggests that the live courses are
14 approved as permitting one to qualify to take the real estate licensing examination in violation
15 of Section 3000(a)(2)(B)(5) of the Regulations;

16 c. A material change to approved equivalent courses which was not submitted to
17 the Bureau for approval prior to use in violation of Section 3002(b) of the Regulations; and

18 d. A failure to comply with the standards for advertising or promotional material
19 as is set forth in Section 3004 of the Regulations.

20 The foregoing is grounds for the withdrawal of approval of pre-licensing course
21 offerings identified in Paragraph 2, above, pursuant to the provisions of Code Section 10153.5
22 and Section 3003 of the Regulations.

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

1 Western Association of Schools and Colleges, and therefore, approval of said courses should be
2 and hereby is withdrawn pursuant to the provisions of Section 3003 of the Regulations.
3

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

15 DATED 1/31/17
16

17 WAYNE S. BELL
18 REAL ESTATE COMMISSIONER

19 
20

21 By: DANIEL J. SANDRI
22 Chief Deputy Commissioner

23
24 cc: UNITED EDUCATIONAL SERVICES
25 CRAIG ALAN DUBRON
26 Shelly Wilson
27 Sacto, Flag
Sacto, Education