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FILED

SEP 19 2022

DEPT. OF REAL ESTATE
By *[Signature]*

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8
9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-05288 SD
13 JAMES MATTHEW HALL,) ACCUSATION
14 Respondent.)
15 _____)

16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
17 State of California, for cause of Accusation against JAMES MATTHEW HALL
18 (“Respondent”), is informed and alleges as follows:

19 1.

20 The Complainant, Veronica Kilpatrick, acting in her official capacity as a
21 Supervising Special Investigator of the State of California, makes this Accusation against
22 JAMES MATTHEW HALL.

23 2.

24 All references to the “Code” are to the California Business and Professions Code
25 and all references to “Regulations” are to Title 10, Chapter 6, California Code of Regulations.

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Accusation of James Matthew Hall

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3.

Respondent JAMES MATTHEW HALL presently has license rights under the Real Estate Law, Part 1 of Division 4 of the Code as a real estate broker.

SAN DIEGO PROPERTY TRANSACTION

4.

On or about December 20, 2019, seller L. Garnder sold real property at 11489 Spruce Run Drive #A, San Diego, California 92131 (“San Diego property”) to buyer J. Aldawoodi for \$476,000. Respondent represented buyer J. Aldawoodi in the San Diego property transaction and Respondent promised to provide one and one half percent (1.5%) commission or \$7,140 to buyer J. Aldawoodi. Respondent used the unlicensed fictitious business name “Hall Team Real Estate” in the San Diego property transaction.

5.

Respondent failed to provide the promised one and one half percent (1.5%) commission or \$7,140 to buyer J. Aldawoodi.

6.

On or about April 1, 2021, the Superior Court of California, County of San Diego, Small Claims Case No. 37-2020-00021575-SC-SC-CTL, entered judgment in favor of buyer J. Aldawoodi against Respondent in the amount of \$7,140 principal and \$75 costs. Buyer J. Aldawoodi filed the action against Respondent for Respondent’s failure to provide the promised one and one half percent (1.5%) commission or \$7,140 to buyer J. Aldawoodi.

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1 SAN JUAN CAPISTRANO PROPERTY TRANSACTION

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3 On or about August 27, 2020, seller Toll West Coast, LLC sold real property at
4 26324 Paseo Lluvia, San Juan Capistrano, California 92675 (“San Juan Capistrano property”)
5 to buyers C. Leem for \$1,709,318. Respondent represented buyers C. Leem in the San Juan
6 Capistrano property transaction and Respondent promised to provide \$27,500 commission to
7 buyers C. Leem. Respondent used the unlicensed fictitious business name “Hall Team Real
8 Estate” in the San Juan Capistrano property transaction.

9 8.

10 Respondent failed to provide the promised \$27,500 commission to buyers C.
11 Leem, and Respondent only provided \$5,000 to buyers C. Leem.

12 INVESTIGATION OF MAIN OFFICE ADDRESS

13 9.

14 From December 26, 2019, to the present, the main office address maintained by
15 Respondent with the Department of Real Estate (“Department”) is 1902 Wright Pl, Carlsbad,
16 California 92008.

17 10.

18 On or about May 24, 2021, a Department investigation revealed that Respondent
19 failed to maintain an office at 1902 Wright Pl, Carlsbad, California 92008.

20 FIRST CAUSE OF ACTION

21 FRAUD AND DISHONEST DEALING

22 11.

23 The conduct, acts, and omissions of Respondent, as described in Paragraphs 4
24 through 8 above, are in violation of Code section 10176(a), 10176(b), 10176(c), 10176(i),
25 10177(d), 10177(g), and/or 10177(j) and constitute cause under Code sections 10176(a),
26 10176(b), 10176(c), 10176(i), 10177(d), 10177(g), and/or 10177(j) for the suspension or
27 revocation of all the licenses, license endorsements, and license rights of Respondent.

Accusation of James Matthew Hall

1 WHEREFORE, Complainant prays that a hearing be conducted on the
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3 disciplinary action against all the licenses, license endorsements, and license rights of
4 Respondent JAMES MATTHEW HALL under the Real Estate Law, for the cost of
5 investigation and enforcement as permitted by law, and for such other and further relief as may
6 be proper under other applicable provisions of law.

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8 Dated at San Diego, California

9 this 15 day of September, 2022

10
11 *Veronica Kilpatrick*

12 _____
13 Veronica Kilpatrick
14 Supervising Special Investigator

15 cc: JAMES MATTHEW HALL
16 Veronica Kilpatrick
17 Sacto.