

1 MARY ANN SMITH
Deputy Commissioner
2 JOYCE TSAI (CA BAR NO. 241908)
Corporations Counsel
3 Department of Business Oversight
1350 Front Street, Suite 2034
4 San Diego, CA 92101
Telephone: (619) 525-4043 Fax: (619) 525-4045
5 Attorneys for Complainant

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7 BEFORE THE DEPARTMENT OF BUSINESS OVERSIGHT
8 OF THE STATE OF CALIFORNIA

9 CALIFORNIA CORPORATIONS) OAH No. 2013040880
10 COMMISSIONER,)
11 Complainant,) **STIPULATION**
12 vs.)
13 TRANG DANG,)
14 Respondent.)
15)

16 IT IS HEREBY STIPULATED AND AGREED between the Complainant, the California
17 Corporations Commissioner (“Complainant;” now the Commissioner of Business Oversight) and
18 Respondent Trang Dang (“Respondent”) as follows:

19 WHEREAS, Respondent admits the jurisdiction of the California Department of Business
20 Oversight (formerly the California Department of Corporations) over her person and over the
21 subject matter of this Stipulation;

22 WHEREAS, Respondent waives the right to any hearing, including that provided by
23 California Financial Code section 17423, subdivision (b). Further, Respondent waives any and all
24 review by a court of law, including that provided by California Government Code section 11523;

25 WHEREAS, all terms used, but not defined herein, shall have the meaning assigned to them
26 by the California Financial Code;

27 WHEREAS, Respondent represents that no promises of any kind or nature whatsoever were
28

1 made to induce Respondent to enter into this Stipulation, and that this Stipulation is a voluntary act
2 on the part of Respondent;

3 WHEREAS, Respondent, without admitting or denying any of the allegations contained
4 within the Accusation, in the form attached hereto as Exhibit A, hereby agrees and stipulates to the
5 Order Barring Trang Dang From Any Position of Employment, Management or Control (“Order”),
6 in the form attached hereto as Exhibit B;

7 WHEREAS, Respondent Trang Dang agrees not to violate California Financial Code
8 section 17414 and California Code of Regulations, Title 10, sections 1738 and 1741.3;

9 WHEREAS, Respondent agrees and acknowledges that nothing in this Stipulation shall
10 preclude the Commissioner or her agents, officers, or employees, to the extent authorized by law,
11 from referring any evidence or information regarding this matter to any other state or federal law
12 enforcement official, or from assisting, cooperating, or co-prosecuting with regards to any
13 investigation and/or action;

14 WHEREAS, Respondent Trang Dang stipulates and agrees to the finality of the Order.
15 Respondent further understands and agrees that the Order remains in effect and is public, and that
16 Respondent shall not make any statement or representation that is inconsistent with this Stipulation
17 or the Order. Respondent further understands and agrees that this Stipulation does not prevent the
18 Commissioner from taking future action in regards to this matter.
19

20 This Stipulation may be executed in one or more counterparts, each of which shall be an
21 original but all of which, together, shall be deemed to constitute a single document. A fax
22 signature shall be deemed the same as an original signature.

23 JAN LYNN OWEN
24 Commissioner of Business Oversight

25 Dated: October 23, 2013

By: _____
26 Mary Ann Smith
27 Deputy Commissioner

28 Dated: October 23, 2013

TRANG DANG