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DEPT OF REAL ESTATE

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BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation against	)	No. H-07453 SAC
	)	
JOHN H. CHUNG,	)	<u>ACCUSATION</u>
	)	
Respondent.	)	
	)	

The Complainant, Heather Nishimura, a Supervising Special Investigator of the State of California, for cause of Accusation of JOHN H. CHUNG, a.k.a. "John Hung Chung," "John Chung," "Alex Hung Chung," "Alex H. Chung," and "Alex Chung" ("Respondent"), alleges as follows:

1.

The Complainant, Heather Nishimura, a Supervising Special Investigator of the State of California, makes this Accusation in her official capacity.

LICENSE HISTORY

2.

Respondent is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code ("Code"), as a real estate salesperson with Department of Real Estate ("Department" or "DRE") License ID

1 02026579. On or about March 6, 2029, Respondent's real estate salesperson license is set
2 to expire, unless renewed.

3 CRIMINAL CONVICTION

4 3.

5 On or about November 19, 2024, in the Superior Court of California, County of
6 Placer, Case No. 62-200076, Respondent was convicted, upon a no contest plea, for violating
7 Penal Code section 236 (false imprisonment), a misdemeanor. The court suspended the
8 imposition of sentence and placed Respondent on conditional probation for four (4) years,
9 under certain terms and conditions, including in part, completion of thirty (30) days in county
10 jail, completion of a 52-week batterers program, and completion of twenty (20) hours of
11 community service.

12 4.

13 The conviction, as described in Paragraph 3 above, bears a substantial
14 relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations
15 ("Regulations") to the qualifications, functions or duties of a real estate licensee.

16 5.

17 The crime for which Respondent was convicted, as described in Paragraph 3
18 above, constitutes cause under Code sections 490 and 10177(b) for the suspension or
19 revocation of the license and license rights of Respondent under the Real Estate Law.

20 COSTS OF INVESTIGATION AND ENFORCEMENT

21 6.

22 Section 10106 of the Code, provides, in pertinent part, that in any order issued in
23 resolution of a disciplinary proceeding before the Department of Real Estate, the Commissioner
24 may request the administrative law judge to direct a licensee found to have committed a
25 violation of this part to pay a sum not to exceed the reasonable costs of the investigation and
26 enforcement of the case.

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1 These proceedings are brought under the provisions of Section 10100, Division
2 4 of the Business and Professions Code of the State of California and Sections 11500 through
3 11528 of the California Government Code.

4 WHEREFORE, Complainant prays that a hearing be conducted on the
5 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
6 disciplinary action against all the licenses and license rights of JOHN H. CHUNG under the
7 Real Estate Law, for the costs of investigation and enforcement as permitted by law, and for
8 such other and further relief as may be proper under other applicable provisions of law.

9
10 Dated at Sacramento, California, on June 3, 2025.

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12 
13 _____
14 Heather Nishimura
15 Supervising Special Investigator

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18 cc: JOHN H. CHUNG
19 LPT Realty, Inc.
20 Heather Nishimura
21 Sacto.
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