

FILED

AUG 25 2025

DEPARTMENT OF REAL ESTATE
By PJ dew

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8 BEFORE THE DEPARTMENT OF REAL ESTATE
9
10 STATE OF CALIFORNIA

* * *

11 In the Matter of the Accusation of)
12 Z&L PROPERTIES, INC.,) No. H-12770 SF
13 Respondent.) ACCUSATION
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15 The Complainant, STEPHANIE YEE, acting in her official capacity as a
16 Supervising Special Investigator of the State of California, for cause of Accusation against Z&L
17 PROPERTIES, INC. (Respondent), is informed and alleges as follows:

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19 At all times herein mentioned, Respondent was and is presently licensed and/or
20 has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and
21 Professions Code (the Code) by the Department of Real Estate (the Department) as a real estate
22 broker corporation.

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24 On or about October 5, 2023, in the United States District Court, Northern District
25 of California, Case No. 3:23CR00221-001, Respondent was convicted of violating Title 18,
26 United States Code, Sections 1349 (Conspiracy to Commit Honest Services Wire and Mail
Fraud) and 1343, 1346 (Honest Services Wire Fraud), both felonies and crimes which bear a

1 substantial relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations
2 (Regulations), to the qualifications, functions or duties of a real estate licensee.

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4 A diligent search was made of the records of the Department, relating to
5 Respondent's real estate broker corporation license No. 02181352. As a result of said search,
6 no written record was discovered of Respondent notifying the Department of any criminal
7 complaint charging a felony, or conviction.

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9 The facts alleged above, in Paragraph 2, constitute grounds under Sections 490
10 (Conviction of Crime) and 10177 (b) (Conviction of Crime) of the Code for suspension or
11 revocation of all licenses and license rights of Respondent under the Real Estate Law.

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13 The facts alleged above, in Paragraph 3, constitute a violation of Section 10186.2
14 (a)(1)(A), (a)(1)(B) and Section 10186.2 (a)(2) (Failure to Report in Writing of Criminal
15 Complaint and/or Conviction within 30 Days) of the Code, and are grounds for the suspension
16 or revocation of all licenses and license rights of Respondent under Sections 10186.2 (b) and
17 10177(d) (Willful Disregard of Real Estate Laws) of the Code.

18 **COST RECOVERY**

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20 Section 10106 of the Code provides, in pertinent part, that in any order issued in
21 resolution of a disciplinary proceeding before the Department, the Commissioner may request
22 the Administrative Law Judge to direct a licensee found to have committed a violation of this
23 part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the
24 case.

25 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
26 of this Accusation and that upon proof thereof, a decision be rendered revoking all licenses and
27 license rights of Respondent under the Real Estate Law, for the cost of investigation and

1 enforcement as permitted by law, and for such other and further relief as may be proper under
2 other provisions of law.

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8 STEPHANIE YEE
9 Supervising Special Investigator
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12 Dated at Oakland, California, on
13 this 20th day of August, 2025.
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16 DISCOVERY DEMAND
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28 Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the
29 Department hereby makes demand for discovery pursuant to the guidelines set forth in the
30 *Administrative Procedure Act*. Failure to provide Discovery to the Department may result in the
31 exclusion of witnesses and documents at the hearing or other sanctions that the Office of
32 Administrative Hearings deems appropriate.