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MAY 19 2021

DEPT. OF REAL ESTATE

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10
11 BEFORE THE DEPARTMENT OF REAL ESTATE
12 STATE OF CALIFORNIA

13 * * *

14 In the Matter of the Application of) No. H-41989 LA
15 PATRICK J. CHANG,) STATEMENT OF ISSUES
16 Respondent.)
17

18 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
19 of California, for Statement of Issues against PATRICK J. CHANG ("Respondent"), is
20 informed and alleges in her official capacity as follows:

21 1.

22 On or about July 15, 2020, Respondent made application to the Department of
23 Real Estate ("Department") of the State of California for a real estate broker license.

24 (CRIMINAL CONVICTIONS)

25 2.

26 On or about March 10, 2017, in the Superior Court of California, County of Los
27 Angeles, Case No. 6EM04925, Respondent was convicted on a plea of nolo contendere for

STATEMENT OF ISSUES

1 violation of Penal Code section 273.5(a) (injuring a spouse, cohabitant, fiancé, boyfriend,
2 girlfriend or child's parent), a misdemeanor. Respondent was placed on summary probation for
3 thirty-six (36) months, on certain terms and conditions, including, in part, serving one (1) day in
4 Los Angeles County Jail, less credit for one (1) day, performing forty-five (45) days of
5 community labor, completion of twenty-four (24) hours of community service, not associating
6 with and staying one hundred (100) yards from a named party and named location, completion
7 of a fifty-two (52) week domestic violence treatment program, making restitution to the
8 victim(s) per hearing, and payment of fees and a fine.

9
10 3.

11 On or about August 15, 2017, in the Superior Court of California, County of Los
12 Angeles, Case No. 7AM01563, Respondent was convicted on a plea of nolo contendere for
13 violation of Vehicle Code sections 23152(b) and 23540 (driving under the influence within ten
14 (10) years of another DUI offense), a misdemeanor. Respondent was placed on summary
15 probation for four (4) years on certain terms and conditions, including, in part, serving ninety-
16 six (96) hours in Los Angeles County Jail, less credit for twenty-four (24) hours, completion of
17 an eighteen (18) month licensed second-offender alcohol and other drug education and
18 counseling program, completion of the Hospital And Morgue (HAM) program, completion of
19 the Victim Impact Panel (VIP) of Mothers Against Drunk Driving (MADD), enrollment in an
20 SB-38 Program, and payment of fines and fees.

21 4.

22 In aggravation, on or about May 13, 2013, in the Superior Court of California,
23 County of Los Angeles, Case No. 3PS10380, Respondent was convicted on a plea of nolo
24 contendere for violation of Vehicle Code section 23152(b) (DUI with 0.08% or more blood
25 alcohol content), a misdemeanor. Respondent was placed on summary probation for thirty-six
26 (36) months, on certain terms and conditions, including, in part, enrollment in an AB-541
27 program, completion of the Victim Impact Program (VIP) of Mothers Against Drunk Driving

1 (MADD), completion of a three (3) month licensing first-offender alcohol and other drug
2 education and counseling program, and payment of fines, fees, and assessments.

3 5.

4 The crimes of which Respondent was convicted, as described in Paragraphs 2
5 and 3 above, by their facts and circumstances, bear a substantial relationship under Section
6 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications, functions or
7 duties of a real estate licensee.

8 6.

9 The crimes of which Respondent was convicted, as described in Paragraphs 2
10 and 3 above, constitute cause for denial of Respondent's application for a real estate license
11 under California Business and Professions Code sections 480(a)(1) and 10177(b).

12 7.

13 These proceedings are brought under the provisions of Section 10100, Division
14 4 of the Business and Professions Code of the State of California and Sections 11500 through
15 11528 of the California Government Code.

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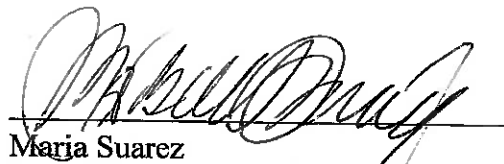
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1 WHEREFORE, the Complainant prays that the above-entitled matter be set for
2 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
3 authorize the issuance of, and deny the issuance of, a real estate salesperson license to
4 Respondent PATRICK J. CHANG and for such other and further relief as may be proper under
5 other applicable provisions of law.

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7 Dated at Los Angeles, California this 10th day of May, 2021.

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10 
11 Maria Suarez
12 Supervising Special Investigator
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26 cc: PATRICK J. CHANG
27 Maria Suarez
Sacto.