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FILED

JAN 29 2024

DEPT. OF REAL ESTATE
By: 

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation against
12 JON MICHAEL WOODS,
13 Respondent.

DRE No. H-42730 LA
ACCUSATION

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15 The Complainant, Ray Dagnino, a Supervising Special Investigator for the Department
16 of Real Estate¹ ("Department") of the State of California, for cause of Accusation against JON
17 MICHAEL WOODS, aka Jon M. Woods and Jon Woods ("Respondent"), is informed and
18 alleges as follows:

19 1. The Complainant, Ray Dagnino, a Supervising Special Investigator for the
20 Department, makes this Accusation in his official capacity.

21 2. Respondent is presently licensed and/or has license rights under the Real Estate
22 Law (Part 1 of Division 4 of the Code²).

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24 ¹ Between July 1, 2013, and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate under the Department of Consumer Affairs.

² Unless otherwise noted, all references to the "Code" are to the California Business and Professions Code.

1 3. From March 11, 2000, through the present, Respondent has been licensed by the
2 Department as a real estate broker, License ID 00798546. Respondent’s license is scheduled to
3 expire on March 18, 2024. Respondent has renewal rights pursuant to Code section 10201. The
4 Department retains jurisdiction pursuant to Code section 10103. Respondent was formerly
5 licensed as a real estate salesperson from approximately November 5, 1980, through March 10,
6 2000.

7 FIRST CAUSE OF ACCUSATION

8 State Bar Disciplinary Action SBC-19-O-30236

9 4. Code section 10177, subdivision (f), provides that the Real Estate Commissioner
10 may suspend or revoke the license of a real estate licensee if a licensee has acted or conducted
11 themselves in a manner that would have warranted the denial of their application for a real estate
12 license, either had a license denied or had a license issued by another agency of this state,
13 another state, or the federal government revoked, surrendered, or suspended, or received an
14 order of debarment, for acts that, if done by a real estate licensee, would be grounds for the
15 suspension or revocation of a California real estate license, if the action of denial, revocation,
16 surrender, suspension, or debarment by the other agency or entity was taken only after giving
17 the licensee or applicant fair notice of the charges, an opportunity for a hearing, and other due
18 process protections comparable to the Administrative Procedure Act (Chapter 3.5 (commencing
19 with Section 11340), Chapter 4 (commencing with Section 11370), and Chapter 5 (commencing
20 with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code), and only upon
21 an express finding of a violation of law by the agency or entity.

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all references to the “Real Estate Law” are to Part 1 of Division 4 of the Code, and all references to “Regulations”
are to the Regulations of the Real Estate Commissioner, California Code of Regulations, Title 10, Chapter 6.

1 5. Respondent was admitted to practice law in the State of California on
2 December 19, 1995.

3 6. On May 22, 2019, the Office of Chief Trial Counsel (“OCTC”) of the State Bar
4 of California filed a Notice of Disciplinary Charges (“NDC”) against Respondent in Case No.
5 SBC-19-O-30236. The OCTC then filed a first amended NDC on June 5, 2019, to which
6 Respondent was charged with: 1) having a conflict of interest with a client; 2) having a conflict
7 in a client’s subject matter; 3) conducting a business transaction with a client without proper
8 warnings; 4) acquiring an interest adverse to a client; 5) breaching the duty of loyalty; 6) failing
9 to withdraw from representation when required; 7) failing to notify a client of the employment
10 of a disbarred attorney (two counts); 8) aiding a disbarred attorney in the unauthorized practice
11 of law; 9) failing to deposit funds in a trust account; 10) committing moral turpitude for
12 misappropriating funds; and 11) failing to pay out client funds promptly.

13 7. Respondent filed a response on June 27, 2019. Following the trial on the
14 contested disciplinary matter, Respondent was found culpable of Count Six (failure to withdraw
15 when mandatory) Counts Seven and Eight (failure to notify a client of employment of a
16 disbarred attorney) and Count Nine (aiding the unauthorized practice of law). The remaining
17 counts were dismissed with prejudice.

18 8. On or about March 1, 2021, the Supreme Court of California issued an Order in
19 Case No. S265120. Respondent was suspended from the practice of law for one year, execution
20 of the suspension was stayed, and Respondent was placed on probation for two years subject to
21 certain conditions, including passing the Multistate Professional Responsibility Examination
22 and paying costs to the State Bar.

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1 9. Respondent's acts, as described above in Paragraph 7, if done by a real estate
2 licensee, would be grounds for the suspension or revocation of a real estate license pursuant to
3 Code sections 10130, 10176, subdivision (a), and 10176, subdivision (i).

4 10. The suspension of Respondent's license to practice law constitutes cause for the
5 suspension or revocation of Respondent's real estate license and license rights pursuant to Code
6 section 10177, subdivision (f).

7 SECOND CAUSE OF ACCUSATION

8 State Bar Disciplinary Action SBC-22-C-30904

9 11. There is hereby incorporated in this Second, separate and distinct Cause of
10 Accusation all of the allegations contained in Paragraphs 1 through 10, with the same force and
11 effect as if herein fully set forth.

12 12. On or about September 15, 2022, the OCTC submitted a transmittal of Records of
13 Conviction, following Respondent's felony convictions described below in Paragraph 19. On or
14 about November 14, 2022, Respondent's license to practice law was placed on interim
15 suspension pending final resolution of that proceeding. Respondent is currently not eligible to
16 practice law.

17 13. The suspension of Respondent's license to practice law constitutes cause for the
18 suspension or revocation of Respondent's real estate license and license rights pursuant to Code
19 section 10177, subdivision (f).

20 THIRD CAUSE OF ACCUSATION

21 Failure to Timely Report - Code section 10186.2

22 14. There is hereby incorporated in this Second, separate and distinct Cause of
23 Accusation, all of the allegations contained in Paragraphs 1 through 13, above, with the same
24 force and effect as if herein fully set forth.

1 15. Code section 10186.2 states:

2 “(a) (1) A licensee shall report any of the following to the department:

3 (A)The bringing of a criminal complaint, information, or indictment charging a
4 felony against the licensee.

5 (B) The conviction of the licensee, including any verdict of guilty, or plea of
6 guilty or no contest, of any felony or misdemeanor.

7 (C) Any disciplinary action taken by another licensing entity or authority of this
8 state or of another state or an agency of the federal government.

9 (2) The report required by this subdivision shall be made in writing within 30 days
10 of the date of the bringing of the indictment or the charging of a felony, the conviction, or
11 the disciplinary action.”

12 16. A diligent search was made of the Department’s records for Respondent and no
13 record or written notice was found to have been timely received from Respondent, notifying the
14 Department of the bringing of the charging of the felonies, the felony convictions, the State Bar
15 disciplinary actions against Respondent, or the suspension of Respondent’s license to practice
16 law, as described in Paragraphs 6 through 12, 18, and 19, within 30 days of said actions.

17 17. Respondent’s failure to provide timely written notice to the Department pursuant
18 to Code section 10186.2 constitutes cause for the suspension or revocation of Respondent’s real
19 estate license and license rights under Code section 10186.2, subdivision (b), and section 10177,
20 subdivisions (d) and/or (g).

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1 In Aggravation

2 Convictions

3 18. On or about June 05, 2017, a Felony Complaint Warrant was filed against
4 Respondent, before the before the Superior Court of California, County of Orange, in Case No.
5 17CF1373. Amendments to the Felony Complaint were filed on January 8, 2018, and
6 February 14, 2018. On March 23, 2018, an Information was filed against Respondent in Case
7 No. 17CF1373. Multiple amendments to the Information were filed between August 24, 2018,
8 and December 10, 2019.

9 19. On or about October 21, 2022, before the Superior Court of California, County
10 of Orange, in Case No. 17CF1373, Respondent was found guilty by a jury and convicted of
11 violating one count of Penal Code section 182(a)(1) (conspire to commit a crime); three counts
12 of Penal Code section 549 (false and fraudulent claim); and 33 counts of Penal Code section
13 550(b)(3) (insurance fraud), all felonies. Respondent was also found guilty of an enhancement
14 pursuant to Penal Code 186.11(1)(1)/(2) (aggravated white collar crime). Respondent was
15 sentenced to serve four years in state prison and pay total restitution of \$701,452.00.

16 20. Respondent appealed his convictions described above in Paragraph 19.
17 Respondent's appeal is still pending before the Fourth District Court of Appeal, Division Three,
18 Case No. G061948.

19 COST RECOVERY

20 21. Code Section 10106 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.

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

7 Dated Jan 23, 2024, at Los Angeles, California.

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10 RAY DAGNINO
11 Supervising Special Investigator

12
13 cc: Jon Michael Woods
14 Ray Dagnino
15 Sacto.