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BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of
CHUCK LIU,
Respondent.

No. H-42848-LA
ACCUSATION

The Complainant, Jason Parson, a Supervising Special Investigator for the Department of Real Estate ("Department" or "DRE") of the State of California, for cause of Accusation against CHUCK LIU, also known as Chang Qing Liu, also known as Changqing Liu ("Respondent"), is informed and alleges in his official capacity as follows:

1. The Complainant, Jason Parson, acting in his official capacity as a Supervising Special Investigator, makes this Accusation against Respondent.

2. Respondent presently 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 broker ("REB") (DRE license identification number 01303022).

FIRST CAUSE OF ACCUSATION

(CRIMINAL CONVICTION)

3. On or about August 14, 2023, in the Orange County Superior Court, Case No. 22NM03577, Respondent was convicted based on his guilty plea for violation of Penal Code section 273.5(a) (domestic battery with corporal injury), a misdemeanor. The court suspended imposition of sentence and placed Respondent on informal probation for a period of three (3) years, subject to

ACCUSATION

1 terms and conditions including but not limited to: being committed to the custody of the sheriff for
2 120 days, with 4 days' credit, with 56 days to be served in the Work Release Program; paying fees,
3 a restitution fine, and restitution; complete a Domestic Violence Batterers' Treatment Program;
4 complete eight (8) hours of community service, which the court deemed satisfied; and comply with
5 all terms of a protective order.

6 4. The conviction, as described in Paragraph 3 above, bears a substantial relationship
7 under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications,
8 functions, or duties of a real estate licensee.

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

12 SECOND CAUSE OF ACCUSATION

13 (FAILURE TO REPORT FELONY CHARGE)

14 6. The Complainant realleges and incorporates by reference all of the allegations
15 contained in paragraphs 1 through 5 above, with the same force and effect as though fully set forth
16 herein.

17 7. Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, "The
18 conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest, of any
19 felony or misdemeanor" to the Department within thirty (30) days of the conviction. Respondent
20 failed to report in writing to the Department the conviction described in Paragraph 3 above, within
21 thirty (30) days of the conviction.

22 8. Respondent's failure to timely report his conviction violates Code section 10186.2
23 and constitutes cause under Code section 10186.2 and 10177(d) for the suspension or revocation of
24 the license and license rights of Respondent under the Real Estate Law.

25 COSTS

26 (COSTS OF INVESTIGATION AND ENFORCEMENT)

27 9. California Business and Professions Code section 10106, provides, in pertinent part,
28 that in any order issued in resolution of a disciplinary proceeding before the Department of Real

1 Estate, the Commissioner may request the administrative law judge to direct a licensee found to
2 have committed a violation of this part to pay a sum not to exceed the reasonable costs of the
3 investigation and enforcement of the case.

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

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10 Dated April 2, 2024, at Los Angeles, California.

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13 *Veronica Kilpatrick* for Jason Parson

14 Jason Parson
Supervising Special Investigator

15
16 cc: CHUCK LIU
17 All Star 21 Realty Inc.
18 Jason Parson
Sacto.