

STEVE CHU, Attorney (SBN 238155)
Department of Real Estate
320 West 4th Street, Suite 350
Los Angeles, California 90013-1105

Telephone: (213) 620-6430
Fax: (213) 576-6917

FILED

DEC 02 2024

DEPT. OF REAL ESTATE

By- [REDACTED]

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of	)	No. H-43025 LA
	)	
STEVE WONGUEN CHANG,	)	<u>A C C U S A T I O N</u>
	)	
Respondent.	)	
	)	

The Complainant, Ray Dagnino, a Supervising Special Investigator of the State of California, for cause of Accusation against STEVE WONGUEN CHANG ("Respondent"), is informed and alleges as follows:

1.

The Complainant, Ray Dagnino, acting in his official capacity as a Supervising Special Investigator of the State of California, makes this Accusation against STEVE WONGUEN CHANG.

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 restricted real estate salesperson.

///

Accusation of STEVE WONGUEN CHANG

1 3.

2 On or about July 9, 1987, Respondent pled guilty and was convicted in the
3 Municipal Court of California, County of Los Angeles, Case No. 31383651, for violation of
4 California Labor Code section 212(a) (Non-Negotiable Payment of Wage), a misdemeanor.
5 Respondent was placed on 12 months of summary probation.

6 4.

7 On or about October 23, 1989, Respondent made application to the Department
8 of Real Estate of the State of California ("Department") for a real estate broker license
9 ("1989 license application").

10 5.

11 In response to Question 20, under the Background Information section of the
12 1989 license application, to wit, "HAVE YOU EVER BEEN CONVICTED OF ANY
13 VIOLATION OF LAW", Respondent answered "NO," and failed to disclose the conviction
14 described in Paragraph 3 above.

15 6.

16 On or about December 5, 1989, the Department granted Respondent a real estate
17 broker license.

18 7.

19 On or about April 4, 2008, Respondent, in Case No. H-34909 LA, signed a
20 declaration to surrender his real estate broker license. The Department had started an
21 investigation of Respondent's real estate activities after the Department received a written
22 complaint alleging that Respondent fraudulently added a loan prepayment penalty addendum to
23 a loan after the borrower had signed the loan documents and that Respondent never disclosed a
24 prepayment penalty to borrower.

25 ///

26 ///

27 ///

Accusation of STEVE WONGUEN CHANG

1 8.

2 On or about June 18, 2008, the Real Estate Commissioner, in Case
3 No. H-34909 LA, signed the Order Accepting Voluntary Surrender of Real Estate License,
4 effective July 14, 2008, which accepted Respondent's surrender of his real estate broker
5 license.

6 9.

7 On or about April 3, 2014, in the Superior Court of California, County of Los
8 Angeles, Case No. BC541476, Allstate Insurance Company, et al., initiated a civil court action
9 against Respondent by filing a complaint ("2014 civil court action").

10 10.

11 On or about June 5, 2016, Respondent petitioned for reinstatement of his real
12 estate broker license. However, Respondent failed to disclose the conviction described in
13 Paragraph 3 above, and failed to disclose the 2014 civil court action described in Paragraph 9
14 above to the Department

15 11.

16 On or about July 4, 2016, Respondent entered into a settlement agreement with
17 Allstate Insurance Company, et al., to settle the 2014 civil court action against Respondent
18 ("2016 settlement agreement"). Respondent agreed to pay \$200,000 to Allstate Insurance
19 Company, et al., starting on August 15, 2016, for a period of 60 months.

20 12.

21 On or about July 25, 2017, the Real Estate Commissioner signed the Order
22 Denying Reinstatement of License but Granting Right to a Restricted License in Case
23 No. H-34909 LA, effective August 16, 2017. However, Respondent failed to disclose the
24 conviction described in Paragraph 3 above, failed to disclose the 2014 civil court action
25 described in Paragraph 9 above, and failed to disclose the 2016 settlement agreement described
26 in Paragraph 11 above to the Department or Real Estate Commissioner.

27 ///

13.

On or about March 30, 2018, Respondent made application to the Department for a restricted real estate salesperson license ("2018 license application").

14.

In response to Question 23, under the Background Information section of the 2018 license application, to wit, "HAVE YOU EVER BEEN CONVICTED (SEE PARAGRAPH ABOVE) OF ANY VIOLATION OF THE LAW AT THE MISDEMEANOR OR FELONY LEVEL? IF YES, COMPLETE ITEM 29 WITH INFORMATION ON EACH CONVICTION", Respondent answered "NO," and failed to disclose the conviction described in Paragraph 3 above.

15.

On or about April 25, 2018, the Department granted Respondent a restricted real estate salesperson license.

16.

On or about February 8, 2021, Respondent made application to the Department for a real estate broker license ("2021 license application").

17.

On or about February 14, 2022, Respondent submitted an Interview Information Statement to the Department ("Interview Information Statement").

18.

In response to the question under the Civil Court section of the Interview Information Statement, to wit, "HAVE YOU OR ANY ENTITY IN WHICH YOU HAD OWNERSHIP, HELD AN OFFICER TITLE, OR EXERCISED CONTROL EVER BEEN A DEFENDANT IN A CIVIL COURT ACTION, INCLUDING SMAL CLAIMS ACTIONS", Respondent answered "NO," and failed to disclose the 2014 civil court action described in Paragraph 9 above.

///

19.

The conduct, acts, or omissions of Respondent, as described in Paragraphs 16 through 18 above, are in violation of Code sections 10177(j) and/or 10177(k), and constitutes cause under Code sections 10177(j) and/or 10177(k) for the suspension or revocation of all the licenses, license endorsements, and license rights of Respondent.

20.

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

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all the licenses, license endorsements, and license rights of Respondent STEVE WONGUEN CHANG under the Real Estate Law, for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California

This 2nd day of December, 2024.



Ray Dagnino
Supervising Special Investigator

cc: STEVE WONGUEN CHANG
ANB Realty, Inc.
Ray Dagnino
Sacto.

Accusation of STEVE WONGUEN CHANG