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**FILED**

APR 01 2025

DEPT. OF REAL ESTATE

By- [REDACTED]

BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of	)	No. H-43055 LA
	)	
ALLIANZE MORTGAGE SERVICES INC,	)	<u>ACCUSATION</u>
doing business as Allianz Mortgage,	)	
Allianze Mortgage Services,	)	
Allianz Mortgage,	)	
Allianz Mortgage & Real Estate Services,	)	
and Allianz Mortgage Services, and	)	
DELICIA WONG BARBA,	)	
doing business as Re/Max Dynasty,	)	
individually and as designated officer of	)	
Allianze Mortgage Services Inc,	)	
	)	
Respondents.	)	
	)	

The Complainant, Ruth Corral, a Supervising Special Investigator of the State of California, for cause of Accusation against ALLIANZE MORTGAGE SERVICES INC, doing business as Allianz Mortgage, Allianz Mortgage Services, Allianz Mortgage, Allianz Mortgage & Real Estate Services, Allianz Mortgage Services, and DELICIA WONG BARBA, doing business as Re/Max Dynasty, individually and as designated officer of Allianz Mortgage Services Inc, ("Respondents"), is informed and alleges as follows:

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Accusation of ALLIANZE MORTGAGE SERVICES INC and DELICIA WONG BARBA

1. 1

2 The Complainant, Ruth Corral, acting in her official capacity as a Supervising  
3 Special Investigator of the State of California, makes this Accusation against Respondents  
4 ALLIANZE MORTGAGE SERVICES INC and DELICIA WONG BARBA.

2. 5

6 All references to the "Code" are to the California Business and Professions Code  
7 and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

8 LICENSE HISTORY

3. 9

10 Respondent ALLIANZE MORTGAGE SERVICES INC ("ALLIANZE  
11 MORTGAGE") presently has license rights under the Real Estate Law, Part 1 of Division 4 of  
12 the Code as a corporate real estate broker. Respondent also has a company mortgage loan  
13 originator license endorsement

4. 14

15 Respondent DELICIA WONG BARBA ("BARBA") presently has license rights  
16 as a real estate broker. Respondent also has an individual mortgage loan originator license  
17 endorsement.

5. 18

19 From October 29, 2003, to the present, Respondent ALLIANZE MORTGAGE  
20 is licensed by the Department of Real Estate ("Department") as a corporate real estate broker  
21 by and through Respondent BARBA, as the designated officer and broker responsible, pursuant  
22 to Code section 10159.2, for supervising the activities requiring a real estate license conducted  
23 on behalf of ALLIANZE MORTGAGE, or by ALLIANZE MORTGAGE'S officers, agents  
24 and employees.

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Accusation of ALLIANZE MORTGAGE SERVICES INC and DELICIA WONG BARBA

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BROKERAGE

ALLIANZE MORTGAGE SERVICES INC

6.

At all times mentioned, in the City of Whittier, County of Los Angeles, Respondent ALLIANZE acted as a real estate broker, conducting licensed activities within the meaning of Code section 10131(d) (solicits borrowers or lenders for or negotiates loans or collects payments or performs services for borrowers or lenders or note owners in connection with loans secured by real property) and California Financial Code section 17006(a)(4) (broker escrow activities).

INVESTIGATION

ALLIANZE MORTGAGE SERVICES INC

7.

The Department investigated Respondents ALLIANZE and BARBA pertaining to the activities described in Paragraph 6 which require a real estate license.

VIOLATIONS OF THE REAL ESTATE LAW

8.

In the course of activities described in Paragraph 6 above, Respondents ALLIANZE and BARBA acted in violation of the Code and the Regulations in that:

8(a) On or about April 13, 2022, Respondent ALLIANZE employed Rosalina Margarita Figueroa, but did not enter into a written employment relationship agreement with Figueroa until October 21, 2022, in violation of Regulations section 2726.

8(b) On or about October 5, 2022, Respondents ALLIANZE and BARBA originated a mortgage loan for real property at 9227 Florence Ave, Unit 20, Downey, California 90240 ("Downey property"). ALLIANZE and BARBA received compensation for originating and processing the mortgage in the amount of \$11,863.13, but only disclosed to the borrower J. Zarco compensation in the amount of \$8,645.00, in violation of Code section 10176(g).

Accusation of ALLIANZE MORTGAGE SERVICES INC and DELICIA WONG BARBA

1           8(c)    On or about September 30, 2022, Respondent ALLIANZE drafted a  
2 Deed of Trust for the Downey property for borrower J. Zarco to sign. The lender was United  
3 Wholesale Mortgage, LLC, but ALLIANZE wrote that the lender was ALLIANZE in the Deed  
4 of Trust, in violation of Code section 10234.

5           8(d)    On or about September 30, 2022, Respondent ALLIANZE drafted a  
6 Note for the Downey property for borrower J. Zarco to sign. The lender was United Wholesale  
7 Mortgage, LLC, but ALLIANZE wrote that the lender was ALLIANZE in the Note, in  
8 violation of Code section 10176(a).

9           8(e)    On or about September 27, 2022, Respondent ALLIANZE drafted a  
10 Closing Disclosure for the Downey property for borrower J. Zarco to sign. The lender was  
11 United Wholesale Mortgage, LLC, but ALLIANZE wrote that the lender was ALLIANZE in  
12 the Closing Disclosure, in violation of Code section 10176(a).

13           8(f)    On or about September 30, 2022, Respondent ALLIANZE drafted a  
14 California Financing Law Statement of Loan for the Downey property for borrower J. Zarco to  
15 sign. The California Financing Law Statement of Loan stated that ALLIANZE was licensed by  
16 the Department of Financial Protection and Innovation, but ALLIANZE has never been  
17 licensed by the Department of Financial Protection and Innovation, in violation of Code  
18 section 10176(a).

19           8(g)    On or about September 2, 2022, Respondent ALLIANZE drafted a Fair  
20 Lending Notice for the Downey property for borrower J. Zarco to sign. The Fair Lending  
21 Notice stated that the borrower could file a complaint with the Department of Financial  
22 Protection and Innovation, but ALLIANZE has never been licensed by the Department of  
23 Financial Protection and Innovation, in violation of Code section 10177(g).

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1                   8(h)    On or about October 20, 2022, Respondent ALLIANZE originated a  
2 mortgage loan for real property at 674 Wilson Place, Monterey Park, California 91755  
3 (“Monterey Park property”). ALLIANZE received compensation for originating and  
4 processing the mortgage in the amount of \$23,333.54, but only disclosed to the borrowers  
5 V. Mendez and M. Mendez compensation in the amount of \$15,035.00, in violation of Code  
6 section 10176(g).

7                   8(i)    On or about October 12, 2022, Respondent ALLIANZE drafted a Deed  
8 of Trust for the Monterey Park property for borrowers V. Mendez and M. Mendez to sign. The  
9 lender was United Wholesale Mortgage, LLC, but ALLIANZE wrote that the lender was  
10 ALLIANZE in the Deed of Trust, in violation of Code section 10234.

11                  8(j)    On or about October 12, 2022, Respondent ALLIANZE drafted a Note  
12 for the Monterey Park property for borrowers V. Mendez and M. Mendez to sign. The lender  
13 was United Wholesale Mortgage, LLC, but ALLIANZE wrote that the lender was ALLIANZE  
14 in the Note, in violation of Code section 10176(a).

15                  8(k)    On or about October 5, 2022, Respondent ALLIANZE drafted a Closing  
16 Disclosure for the Monterey Park property for borrowers V. Mendez and M. Mendez to sign.  
17 The lender was United Wholesale Mortgage, LLC, but ALLIANZE wrote that the lender was  
18 ALLIANZE in the Closing Disclosure, in violation of Code section 10176(a).

19                  8(l)    On or about October 12, 2022, Respondent ALLIANZE drafted a  
20 California Financing Law Statement of Loan for the Monterey Park property for borrowers  
21 V. Mendez and M. Mendez to sign. The California Financing Law Statement of Loan  
22 answered “No” to the question, “Has any person performed any act as broker in connection  
23 with the making of the loan?”, did not provide the amount of broker fees, and stated that  
24 ALLIANZE was licensed by the Department of Financial Protection and Innovation, but  
25 ALLIANZE has never been licensed by the Department of Financial Protection and Innovation,  
26 in violation of Code section 10176(a).

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1                   8(m) On or about October 3, 2022, Respondent ALLIANZE drafted a Fair  
2 Lending Notice for the Monterey Park property for borrowers V. Mendez and M. Mendez to  
3 sign. The Fair Lending Notice stated that the borrower could file a complaint with the  
4 Department of Financial Protection and Innovation, but ALLIANZE has never been licensed by  
5 the Department of Financial Protection and Innovation, in violation of Code sections 10176(a)  
6 and 10166.051(a) and Health and Safety Code section 35830.

7                   8(n) On or about October 27, 2022, Respondent ALLIANZE drafted a Deed  
8 of Trust for real property at 3361 Cedarglen Court, Ontario, California 91761 ("Ontario  
9 property") for borrowers D. Rodriguez and Y. Rodriguez to sign. The lender was United  
10 Wholesale Mortgage, LLC, but ALLIANZE wrote that the lender was ALLIANZE in the Deed  
11 of Trust, in violation of Code section 10234.

12                   8(o) On or about October 27, 2022, Respondent ALLIANZE drafted a Note  
13 for the Ontario property for borrowers D. Rodriguez and Y. Rodriguez to sign. The lender was  
14 United Wholesale Mortgage, LLC, but ALLIANZE wrote that the lender was ALLIANZE in  
15 the Note, in violation of Code section 10176(a).

16                   8(p) On or about October 18, 2022, Respondent ALLIANZE drafted a  
17 Closing Disclosure for the Ontario property for borrowers D. Rodriguez and Y. Rodriguez to  
18 sign. The lender was United Wholesale Mortgage, LLC, but ALLIANZE wrote that the lender  
19 was ALLIANZE in the Closing Disclosure, in violation of Code section 10176(a).

20                   8(q) On or about October 27, 2022, Respondent ALLIANZE drafted a  
21 California Financing Law Statement of Loan for the Ontario property for borrowers  
22 D. Rodriguez and Y. Rodriguez to sign. The California Financing Law Statement of Loan  
23 answered "No" to the question, "Has any person performed any act as broker in connection  
24 with the making of the loan?", did not provide the amount of broker fees, and stated that  
25 ALLIANZE was licensed by the Department of Financial Protection and Innovation, but  
26 ALLIANZE has never been licensed by the Department of Financial Protection and Innovation,  
27 in violation of Code section 10176(a).

1                   8(r)    On or about September 26, 2022, Respondent ALLIANZE drafted a Fair  
2 Lending Notice for the Ontario property for borrowers D. Rodriguez and Y. Rodriguez to sign.  
3 The Fair Lending Notice stated that the borrower could file a complaint with the Department of  
4 Financial Protection and Innovation, but ALLIANZE has never been licensed by the  
5 Department of Financial Protection and Innovation, in violation of Code sections 10176(a)  
6 and 10166.051(a) and Health and Safety Code section 35830.

7                   8(s)    The conduct, acts, or omissions of Respondent BARBA, as described in  
8 Paragraph 8, in failing to ensure compliance of the Real Estate Law by Respondent  
9 ALLIANZE'S officers, agents and employees, is in violation of Code section 10159.2 and  
10 Regulations section 2725.

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The conduct, acts, or omissions of Respondents ALLIANZE and BARBA, described in Paragraph 8 above, violated the Code and the Regulations as set forth below:

<u>PARAGRAPH</u>	<u>PROVISIONS VIOLATED</u>
8(a)	Regulations section 2726 (ALLIANZE)
8(b)	Code section 10176(g) (ALLIANZE and BARBA)
8(c)	Code section 10234 (ALLIANZE)
8(d)	Code section 10176(a) (ALLIANZE)
8(e)	Code section 10176(a) (ALLIANZE)
8(f)	Code section 10176(a) (ALLIANZE)
8(g)	Code section 10177(g) (ALLIANZE)
8(h)	Code section 10176(g) (ALLIANZE)
8(i)	Code section 10234 (ALLIANZE)
8(j)	Code section 10176(a) (ALLIANZE)
8(k)	Code section 10176(a) (ALLIANZE)
8(l)	Code section 10176(a) (ALLIANZE)
8(m)	Code sections 10176(a) and 10166.051(a) and Health and Safety Code section 35830 (ALLIANZE)
8(n)	Code section 10234 (ALLIANZE)
8(o)	Code section 10176(a) (ALLIANZE)
8(p)	Code section 10176(a) (ALLIANZE)
8(q)	Code section 10176(a) (ALLIANZE)
8(r)	Code sections 10176(a) and 10166.051(a) and Health and Safety Code section 35830 (ALLIANZE)
8(s)	Code section 10159.2 and Regulations section 2725 (BARBA)



The foregoing violations constitute cause for the suspension or revocation of all the licenses, license endorsements, and license rights of Respondent ALLIANZE under the Real Estate Law pursuant to the provisions of Code sections 10176(a), 10176(g), 10177(d), and 10177(g).

The foregoing violations constitute cause for the suspension or revocation of all the licenses, license endorsements, and license rights of Respondent BARBA under the Real Estate Law pursuant to the provisions of Code sections 10176(g) 10177(d), 10177(g), and 10177(h).

10.

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 Respondents ALLIANZE MORTGAGE SERVICES INC and DELICIA WONG BARBA 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 Sacramento, California

this 28th day of March, 2025

Ruth Corral  
Supervising Special Investigator

## Accusation of ALLIANZE MORTGAGE SERVICES INC and DELICIA WONG BARBA

1 cc: ALLIANZE MORTGAGE SERVICES INC  
2 DELICIA WONG BARBA  
3 Ruth Corral  
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