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FILED

JUL 13 2026

DEPT. OF REAL ESTATE

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of	)	No. H-43167 LA
	)	
	)	
JACK YANG,	)	ACCUSATION
	)	
Respondent.	)	
	)	

The Complainant, Ray Dagnino, a Supervising Special Investigator of the State of California, acting in his official capacity, for cause of Accusation against Respondents JACK YANG ("Respondent"), is informed and alleges as follows:

1.

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

2.

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

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(License History)

3.

a. Respondent is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the Code as a real estate broker (license no. 02013453). Respondent was originally licensed as a real estate broker on or about September 4, 2021, and has been so licensed from on or about September 4, 2021 to September 3, 2025 and from on or about September 20, 2025 through the present. Previously, Respondent was licensed as a real estate salesperson from on or about November 16, 2016 to November 15, 2020 and from on or about July 4, 2021 to September 3, 2021. At no time has Respondent had a fictitious business name registered with the Department of Real Estate.

b. Respondent has been a broker associate for Real Estate Elite Corporation (license no. 01379606) from on or about April 30, 2024 to September 4, 2025 and from on or about September 25, 2025 through the present. Real Estate Elite Corporation's fictitious business names have been "Re/Max Elite Realty" from on or about July 10, 2003 through the present and "Re/Max Premier Properties" from on or about June 9, 2008 through the present.

c. Previously, Respondent was a broker associate for LH Enterprises, Inc. (license no. 02003950) from on or about September 10, 2021 to April 30, 2024. LH Enterprises, Inc.'s fictitious business names have been "KW Executive" from on or about July 1, 2016 through the present, "Executive Escrow Services: A Non-Independent Broker Escrow" from on or about August 30, 2016 through the present, and "KW Commercial" from on or about May 28, 2019 through the present.

(Real Estate Activities)

4.

At all times mentioned, in the County of Los Angeles, Respondent engaged in the business of a real estate broker conducting licensed activities within the meaning of

1 Code section 10131(b) (“[l]eases or rents or offers to lease or rent, or places for rent, or solicits
2 listings of places for rent, or solicits for prospective tenants, or negotiates the sale, purchase, or
3 exchanges of leases on real property, or on a business opportunity, or collects rents from real
4 property, or improvements thereon, or from business opportunities”).¹

5
6 (Trust Fund Audit)

7 5.

8 On or about May 16, 2025, the Department of Real Estate completed an audit
9 examination of the books and records of Respondent to determine whether Respondent handled
10 and accounted for trust funds and conducted their real estate activities in accordance with
11 the Real Estate Law and Regulations. The audit examination covered a period of time beginning
12 on January 1, 2023 and ending on December 31, 2024. The audit examination revealed
13 violations of the Code and the Regulations set forth in the following paragraphs, and more fully
14 discussed in Audit Report LA240045 and the exhibits and work papers attached to said audit
15 report.

16 6.

17 On or about April 15, 2024, T. B., a property owner, filed a complaint about
18 Respondent with the Department of Real Estate. Therein, T. B. stated Respondent was their
19 property manager from at least 2023 through 2024, and Respondent failed as a property
20 manager in part because Respondent could not be reached by T. B. and/or the tenants for
21 months, failed to inform T. B. of tenants’ requests for repairs, and failed to make repairs that
22 T. B. authorized and/or paid for. Repairs needed to be made to the air conditioner, stove, and
23 other essential items.

24
25 ¹ Respondent was also engaged in the business of a real estate broker conducting licensed
26 activities within the meaning of Code section 10131(a) (“[s]ells or offers to sell, buys or offers
27 to buy, solicits prospective sellers or buyers of, solicits or obtains listings of, or negotiates the
purchase, sale, or exchange of real property or a business opportunity”).

1 7.

2 On or about March 2, 2021, Respondent and LH Enterprises, Inc. entered into an
3 Independent Contractor Agreement in which LH Enterprises, Inc. would be Respondent's
4 supervising broker for licensed real estate activities, except for property management and loan
5 brokerage activity.

6 8.

7 On or about August 28, 2023, Respondent, supposedly on behalf of LH
8 Enterprises, Inc. dba "KW Executive," and T. B. entered into a Property Management
9 Agreement wherein LH Enterprises, Inc. through Respondent would provide property
10 management services for 129 Overbrook, Irvine, CA 92620 ("Property") from September 1,
11 2023 to August 31, 2024 in exchange for compensation in the amount of seven (7) percent of
12 the annual rent. Therein, Respondent also agreed that LH Enterprises, Inc. through Respondent
13 would pay for "Any Repairs Under \$300 During Management Period."

14 9.

15 Respondent failed to inform and/or obtain authorization from LH Enterprises,
16 Inc. to enter into this Property Management Agreement and/or otherwise provide property
17 management services. At no time did LH Enterprises, Inc. authorize Respondent to provide
18 property management services from LH Enterprises, Inc.

19 10.

20 From or about July 22, 2023 to August 16, 2023, Respondent advertised the
21 Property for rent and negotiated the terms with potential renters.

22 11.

23 On or about August 16, 2023, Respondent drafted and signed a Residential Lease
24 to rent the Property to the tenants, Y. L. and M. M. The Residential Lease was effective from on
25 or about August 15, 2023 to August 31, 2024.

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12.

During the audit period from January 1, 2023 and ending on December 31, 2024, Respondent received at least \$540 in compensation for providing property management services after finding and placing tenants into the Property.

13.

On or about April 30, 2024, LH Enterprises, Inc. terminated its Independent Contractor Agreement with Respondent.

(VIOLATIONS)

14.

The conduct, acts, and/or omissions of Respondent JACK YANG, as set forth in paragraphs 3 to 13, above, are in violation of Code sections 10176(a) (substantial misrepresentations), 10176(i) (fraud/dishonest dealing), 10177(d) (willful disregard or violation of Real Estate Law), 10177(g) (negligence and/or incompetence), and/or 10177(j) (fraud/dishonest dealing).

(COSTS)

15.

Code section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the department, 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 investigation and enforcement of the case.

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1 WHEREFORE, Complainant prays that a hearing be conducted on the
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3 disciplinary action against all license(s) and/or license rights under the Real Estate Law (Part 1
4 of Division 4 of the California Business and Professions Code) of Respondent JACK YANG,
5 including, but not limited to, broker license(s) and salesperson license(s), the cost of
6 investigation and enforcement as permitted by law, and for such other and further relief as may
7 be proper under applicable provisions of law.

8 Dated at Los Angeles, California: July 9, 2026.

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11 Ray Dagnino
12 Supervising Special Investigator
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23 cc: JACK YANG
24 Real Estate Elite Corporation
25 Ray Dagnino
26 Sacto
27 Enforcement
 Audits – Anna Hartoonian