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NOV 18 2025

DEPT OF REAL ESTATE

By

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BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation Against)
YOUHAO ZHENG,) No. H-43205 LA
Respondent.) ACCUSATION

The Complainant, Ray Gagnino, a Supervising Special Investigator of the State of California, for cause of Accusation against YOUHAO ZHENG, also known as "Alan Zheng," (Respondent) alleges as follows:

1.

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

2.

All references to the "Code" are to the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code and all references to "Regulations" are to Title 10, Chapter 6, of the California Code of Regulations.

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ACCUSATION

1 LICENSE HISTORY

2 3.

3 a. Respondent is presently licensed and/or has license rights under the Code as a
4 real estate salesperson with Department of Real Estate (Department) license ID 02133168.
5 Respondent's license is set to expire on December 13, 2028, unless renewed. Respondent is not
6 now and has never held a mortgage loan originator ("MLO") license endorsement with the
7 Department.

8 b. Since September 28, 2022, Respondent's responsible broker has been
9 Ameriway Realty with license ID 01999635. Ameriway's designated officer is Wei Po Chang,
10 who is a licensed real estate broker. Ameriway Realty is not now and has never held an MLO
11 license endorsement with the Department.

12 CAUSE FOR ACCUSATION

13 4.

14 At all times relevant herein Respondent was engaged in acts within the meaning
15 of Code section 10131(a), for a compensation or in expectation of a compensation, by selling or
16 offering to sell, buying or offering to buy, soliciting prospective seller or purchasers of,
17 soliciting or obtaining listings of, or negotiating the purchase, sale or exchange of real property
18 or a business opportunity (real estate sales).

19 5.

20 On or about February 19, 2023, Respondent submitted an offer of
21 \$1,120,000.000 on behalf of Respondent's client, buyer M.J.¹ ("buyer"), in the purchase of the
22 residential property located at 3501 Tilden Avenue, Los Angeles, California ("Tilden Avenue
23 property"). The Residential Purchase Agreement ("RPA") was dated February 18, 2023, and
24 listed the buyer's brokerage firm as Ameriway Realty and the buyer's agent as "Alan Zheng"

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28 ¹ Initials are used in place of individual's full name to protect their privacy. Documents containing individual's full name will be provided during the discovery phase of this case to Respondent and/or their attorney(s), after service of a timely and proper request for discovery on Complainant's counsel.

1 with license number 02133168. The RPA indicated that the buyer intended to obtain a loan in
2 the amount of \$675,000.00.

3 6.

4 Along with the offer, Respondent included a Home Buyer Loan Pre-Approval
5 letter from Harmony Funding Inc. dated February 10, 2023. The letter stated that Respondent
6 was the "Loan Officer/Processor" with Nationwide Multistate Licensing System ("NMLS")
7 No. 1582677 and that the buyer had been pre-approved to purchase a home with a maximum
8 sales price of \$1,150,000.00 and a maximum loan amount of \$690,000.00. NMLS No. 1582677
9 belongs to Bill Jianting Liao (Department license ID 02098460), who, at the time, was
10 authorized to represent Harmony Funding Inc. (Department license ID 01935519).
11 Respondent's license is not affiliated with Liao or Harmony Funding Inc.

12 7.

13 The Department received a complaint from a licensed real estate salesperson,
14 J.H., who represented the seller of the Tilden Avenue property. J.H. was aware that Respondent
15 represented the buyer and noticed that Respondent's name was listed in the Pre-Approval
16 Letter as the lender. J.H. looked up the NMLS number listed in the letter and discovered that
17 the NMLS number did not belong to Respondent. The seller ultimately declined Respondent's
18 offer.

19 8.

20 It was revealed that Respondent was unable to reach the lender's loan officer
21 before the offer deadline, altered a pre-approval letter from a previous client with his current
22 buyer's name, and submitted it to the seller's agent with his buyer's offer.

23 (SUBSTANTIAL MISREPRESENTATION)

24 9.

25 The conduct, acts and/or omissions of Respondent, as described above,
26 constitute a substantial misrepresentation and are cause for the suspension or revocation of the
27 license and license rights of Respondent under Code section 10176(a).

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(FRAUD OR DISHONEST DEALING)

10.

The conduct, acts and/or omissions of Respondent as described above, constitute fraud or dishonest dealing and are cause for the suspension or revocation of the license and license rights of Respondent under Code sections 10176(i) and 10177(j).

(FALSE STATEMENT OR REPRESENTATION CONCERNING DESIGNATION)

11.

The conduct, acts and/or omissions of Respondent as described above, constitute material false statement or representation concerning their designation and are cause for the suspension or revocation of the license and license rights of Respondent under Code section 10177(c).

12.

Each of the foregoing violations above constitutes cause for the suspension or revocation of the real estate license and/or license rights of Respondent under the provisions of Sections 10177(d) and 10177(g).

(COSTS OF INVESTIGATION AND ENFORCEMENT)

13.

California Business and Professions 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 and license rights of YOUHAO ZHENG under the Real Estate Law, for the costs 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.

1 Dated at Los Angeles, California this 7th day of November, 2025.

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Ray Dagnino
Supervising Special Investigator

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cc: YOUHAO ZHENG
Ameriway Realty
Ray Dagnino
Sacto.

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ACCUSATION