702-900-6926
2512wt@GMAIL.COM

TSANG H. WANG

440 N. BARRANCA AVE.
#1069
COVINA, CA 91723

March 28, 2026

VIA ELECTRONIC SUBMISSION
VIA CERTIFIED MAIL TO OPPOSING PARTY

California Labor and Workforce Development Agency
Attn: PAGA Administrator
455 Golden Gate Avenue, 9th Floor
San Francisco, CA 94102

Re: **Tsang Han Wang adv. Dream Team Real Estate Consultants, Inc.**
PAGA Notice Pursuant to California Labor Code Section 2699.3, et seq.

Dear Sir/Madam:

I, Tsang Han Wang (hereinafter "Plaintiff"), an aggrieved applicant proceeding *in propria persona*, hereby provide notice pursuant to California Labor Code section 2699.3, et seq. (Private Attorneys General Act of 2004 (hereinafter "PAGA")) of my intent to file a civil action against Dream Team Real Estate Consultants, Inc. (hereinafter "Defendant") for violations of the California Labor Code committed against Plaintiff and all other current and/or former aggrieved employees and applicants. This letter shall serve as notice, and a request, that the Labor and Workforce Development Agency ("LWDA") investigate the alleged violations described herein. If the agency does not intend to investigate the alleged violations, I respectfully request that the agency specifically notify me at the earliest possible opportunity so that I may proceed with a civil action after the expiration of the 65-day review period prescribed by Labor Code section 2699.3.

PAGA imposes no requirement that an aggrieved employee or applicant be represented by counsel. Labor Code section 2699(a) authorizes "an aggrieved employee" to bring a civil action, and the statute contains no limitation based on representation status. Plaintiff is an aggrieved applicant for employment who has personally suffered the violations described herein and is authorized to file this PAGA notice and any subsequent civil action in propria persona.

STATEMENT OF SPECIFIC PROVISIONS OF THE LABOR CODE ALLEGED TO HAVE BEEN VIOLATED

The above-referenced civil action will be brought by Plaintiff against Defendant for violations of the following California Labor Code sections: 432, 432.5, 98.6, and 432.7.

FACTS AND THEORIES IN SUPPORT OF ALLEGED VIOLATIONS

Defendant Dream Team Real Estate Consultants, Inc. is a California corporation (Entity No. 2888286) doing business under the fictitious business name "Equity Union Real Estate," with its principal place of business at 13412 Ventura Blvd., Suite 350, Sherman Oaks, California 91423. Defendant is engaged in the business of real estate brokerage and consulting.

Ali Ketabchi serves as Chief Executive Officer, Secretary, and Chief Financial Officer. Throughout the relevant time period, Defendant employed and recruited workers in the State of California, including for a Marketing Coordinator position in Westlake Village, California, offering compensation of $28.00 to $33.00 per hour plus comprehensive benefits.

Plaintiff Tsang Han Wang (professionally known as "Bruce Wang") is an individual residing in Los Angeles County, California. On or about January 13, 2026, Plaintiff applied for the Marketing Coordinator position with Defendant through Indeed.com. On January 16, 2026, Plaintiff participated in a Zoom interview with Dan Stueve, Defendant's Senior Vice President and General Manager, who determined that Plaintiff was an excellent fit for the position based on his demonstrated qualifications, professional background, and suitability for the role.

The Ex-Ante Psychometric Examination Violation

On January 21, 2026, following Plaintiff's successful interview, Defendant's agent Dan Stueve sent Plaintiff an email requiring completion of a mandatory psychometric assessment as a prerequisite to advance in the hiring process. The assessment was the TTI Talent Insights, Behaviors & Motivators Management/Staff Version, administered by third-party vendor The Abelson Group. This assessment is a sophisticated psychometric instrument that constitutes a comprehensive psychological examination measuring four behavioral dimensions (Dominance, Influence, Steadiness, Compliance) and six motivational drivers (Theoretical, Utilitarian, Aesthetic, Social, Individualistic, Traditional), generating detailed psychological profiles through standardized normative comparisons.

Critically, this assessment was required before any conditional offer of employment was extended to Plaintiff. This is the ex ante timing violation: the psychometric and psychological examination was administered at the pre-offer stage, before Defendant made any conditional employment offer, as a mandatory condition of further consideration for employment. The violation was complete at the moment the assessment was presented as a condition of the employment process, regardless of whether Plaintiff completed the assessment or whether Defendant took any subsequent adverse action.

California Code of Regulations, Title 2, sections 11071(a) and 11070 prohibit employers from conducting medical or psychological examinations or inquiries of applicants before an offer of employment is extended. Section 11017 adopts the Uniform Guidelines on Employee Selection Procedures and makes unlawful any selection practice with adverse impact absent demonstrated job-relatedness and business necessity. While these CCR Title 2 provisions establish the substantive legal standard defining the unlawful conduct, their enforcement authority derives from Government Code section 12935(a) (FEHA). The Labor Code violations described below provide the PAGA enforcement predicates.

Labor Code Section 432: Unlawful Condition of Employment

Labor Code section 432 prohibits an employer from requiring an applicant or employee to submit to an unlawful condition as a prerequisite to employment or continuation of employment, including the compelled waiver of rights established under FEHA and its implementing regulations. Defendant violated section 432 by requiring Plaintiff and all other applicants to submit to a pre-offer psychometric and psychological examination as a mandatory condition of further employment consideration. The CCR Title 2 regulations cited above establish that the examination was unlawful at the pre-offer stage. By conditioning continued consideration for employment on submission to an examination that California regulations prohibit before a conditional offer, Defendant imposed an unlawful condition of employment within the meaning of section 432. This violation was complete at the moment the assessment was presented as a condition of employment consideration, regardless of outcome. This predicate is universal across all five aggrieved populations: applicants who were hired after completing the exam, applicants who refused and were rejected, applicants who completed the exam and were rejected on results, employees denied promotion based on exam results, and employees later terminated where exam results were retained.

Labor Code Section 432.5: Illegal Terms or Conditions of Employment

Labor Code section 432.5 prohibits an employer from imposing illegal terms or conditions as a prerequisite to employment or continued employment. Defendant violated section 432.5 by imposing a pre-offer psychometric examination requirement that violates CCR Title 2, sections 11071(a), 11070, and 11017 as an express condition of continued employment consideration. The violation under section 432.5 is complete at the moment the illegal condition is presented, independent of any subsequent adverse action. Like section 432, this predicate is universal across all aggrieved populations.

Labor Code Section 98.6: Retaliation Against Applicant for Asserting Rights

Labor Code section 98.6 prohibits retaliation against an employee or applicant for asserting rights under the Labor Code or exercising protections established under FEHA and its implementing regulations. Section 98.6 expressly covers applicants for employment. On January 22, 2026, Plaintiff engaged in protected activity by sending Defendant a formal email questioning the legality of the pre-offer psychometric assessment under California employment law and requesting reasonable accommodation information as required by FEHA. Plaintiff explicitly maintained his interest in the position, stating: “I remain very interested in the opportunity.” Following this protected activity, Defendant immediately ceased all communication with Plaintiff, failed to respond to any of Plaintiff’s five specific inquiries regarding accommodations, test validation, data privacy, and compliance, and silently rejected Plaintiff’s application. On February 6, 2026, fifteen days after Plaintiff’s protected activity, Plaintiff discovered that Defendant had changed his application status to “Not selected by employer” on Indeed.com without any direct notification. Under Labor Code section 98.6(e), as amended by Senate Bill 497 (effective January 1, 2024), adverse action occurring within 90 days of protected activity creates a rebuttable presumption of retaliation. Defendant’s rejection of Plaintiff within fifteen days of his protected activity triggers this statutory presumption. This predicate applies to all aggrieved populations where adverse action followed protected activity.

///

///

Labor Code Section 432.7: Prohibited Inquiry Into Arrest and Conviction Records (Conditional, Subject to Verification of Exam Content)

Labor Code section 432.7 prohibits an employer from inquiring into or using arrest records, sealed convictions, or certain criminal history information in connection with employment decisions. This predicate is included conditionally because Plaintiff declined to complete the TTI Talent Insights assessment and therefore does not have full visibility into every question, data field, or scoring component contained within the instrument.

To understand why this matters, it is important to understand how the assessment works in practice. According to The Abelson Group's own instructions, any applicant who takes this assessment must first scroll to the bottom of an "Assessment Instructions" screen and click "I Agree," then complete a personal information section and "check the box that you have read and understand the agreement." In other words, applicants are required to electronically sign an agreement before they can even see the questions on the assessment. They do not know what they are agreeing to disclose until after they have already consented. They are signing blind.

Making this worse, the applicant never receives a copy of the completed assessment or the results. The Abelson Group's instructions state plainly: "The report is emailed directly to the account holder." The "account holder" is the employer, not the applicant. So the person who takes the test, answers the questions, and electronically signs the agreement never gets to see what the test actually said about them, what data was collected, or how the employer used that data to make a hiring decision. The employer gets a detailed 36-page psychological profile. The applicant gets nothing.

This one-sided arrangement is exactly why section 432.7 must be preserved as a conditional predicate in this notice. Because applicants are required to electronically sign an agreement before seeing the questions, and because they never receive a copy of the instrument or their results, there is no way for any applicant to know whether the assessment contains questions that directly or indirectly inquire into criminal history, arrest records, or conviction data. Plaintiff is informed and believes, and thereon alleges, that the TTI Talent Insights assessment may contain questions, data fields, or scoring components that collect or incorporate prohibited criminal history information, whether through direct questions about arrests or convictions, through indirect behavioral questions designed to elicit or proxy for that information, or through integrated background screening components bundled into the assessment platform.

If the instrument does collect or incorporate such prohibited information, then every applicant who was required to take this assessment was subjected to an unlawful inquiry in violation of section 432.7, and they would have no way of knowing it because they never received a copy of the test or the results. This allegation is subject to verification through discovery of the complete assessment instrument, the full question set presented to applicants, all scoring methodologies, data fields, and any integrated components that collect or incorporate criminal history information. Under Labor Code section 2699(f)(2), Defendant is subject to a civil penalty of $100 for each aggrieved employee and applicant per pay period for the initial violation and $200 for each aggrieved employee and applicant per pay period for each subsequent violation.

Aggrieved Employee and Applicant Populations

The violations described above were committed against Plaintiff and all other current and former employees and applicants of Defendant who were subjected to Defendant's mandatory pre-offer psychometric assessment requirement during the applicable statutory period. These aggrieved individuals include, but are not limited to: (1) applicants who submitted to the assessment and were subsequently hired; (2) applicants who refused to submit to the assessment and were denied employment; (3) applicants who submitted to the assessment and were rejected based on results; (4) current or former employees subjected to the assessment as a condition of promotion consideration; and (5) employees who were hired, subjected to the assessment, and subsequently terminated where assessment results were retained in personnel files or referenced in performance evaluations. The violations under Labor Code sections 432 and 432.5 are universal across all five populations because they are complete at the moment the assessment is presented as a condition of consideration, regardless of outcome.

Penalty Exposure

For violations of the Labor Code for which a civil penalty is not specifically provided, Labor Code section 2699(f) imposes a penalty of one hundred dollars ($100.00) for each aggrieved employee and applicant per pay period for the initial violation and two hundred dollars ($200.00) for each aggrieved employee and applicant per pay period for each subsequent violation. Defendant's systematic imposition of unlawful pre-offer psychometric assessments on all applicants, combined with its retaliatory conduct against applicants who challenge these practices, exposes Defendant to substantial aggregate penalties across the entire aggrieved workforce and applicant pool during the applicable statutory period.

Attorney's Fees and Costs

Pursuant to Labor Code section 2699(g)(1), a prevailing employee or applicant in a PAGA action is entitled to recover reasonable attorney's fees and costs. Plaintiff is currently proceeding in propria persona. However, Plaintiff expressly reserves the right to retain counsel at any time during the course of this matter. Should Plaintiff retain an attorney at a later date, Defendant will be responsible for all reasonable attorney's fees and costs incurred from the point of retention forward, as well as any fees and costs that may be recoverable for work performed in connection with this action, pursuant to Labor Code section 2699(g)(1) and applicable California law.

CONCLUSION

I provide this notice pursuant to California Labor Code section 2699.3 of the Private Attorneys General Act of 2004, and specifically ask that the LWDA conduct an investigation as to the alleged violations described herein; or, in the alternative, if the agency does not intend to investigate the alleged violations, I ask that the agency issue an immediate notification to me confirming the same so that I may proceed with a civil action with regard to the PAGA claims described herein against Defendant after the expiration of the 65-day review period.

If you require anything further and/or have any questions, please do not hesitate to contact me in writing. Nothing in this letter is intended to be, nor should be construed as, an admission against the interests of Plaintiff and/or other current and/or former employees and applicants and shall not be construed as a waiver of their rights, remedies, claims, or defenses, all of which are expressly reserved.

Respectfully submitted,

/s/ TSANG HAN WANG

____

Tsang Han Wang
Plaintiff, In Propria Persona

cc: Dream Team Real Estate Consultants, Inc.
Care of: Sorell Law Group, P.C, Registered Agent
13412 Ventura Blvd Ste 350
Sherman Oaks, CA 91423
(*Sent via Certified Mail)*

Jeffery A. Hacker, Esq.
Adamski Moroski Madden Cumberland & Green LLP.
P.O. Box 3835
San Luis Obispo, CA 93403-3835
(*Sent via Certified Mail)*