

FILED

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BUREAU OF REAL ESTATE

By *AW Selouo*

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9 BEFORE THE BUREAU OF REAL ESTATE

10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H- 04918 SD
13 GREAT SOURCE REALTY) A C C U S A T I O N
14 CORPORATION, doing business as)
Arya Financial, SADRI RIAZATI,)
15 individually and as designated officer of)
Great Source Realty Corporation, and)
16 NEDA FATHI,)
17 Respondents.)
18 _____)

19 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
20 State of California, for cause of Accusation against GREAT SOURCE REALTY
21 CORPORATION, doing business as Arya Financial, SADRI RIAZATI, individually and as
22 designated officer of Great Source Realty Corporation, and NEDA FATHI (“Respondents”), is
23 informed and alleges as follows:

24 1.

25 The Complainant, Veronica Kilpatrick, acting in her official capacity as a
26 Supervising Special Investigator of the State of California, makes this Accusation against
27 GREAT SOURCE REALTY CORPORATION, SADRI RIAZATI, and NEDA FATHI.

Accusation of Great Source Realty Corporation, Sadri Riazati, and Neda Fathi

1 2.

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

4 LICENSE HISTORY

5 3.

6 3(a) At all times mentioned, Respondent GREAT SOURCE REALTY
7 CORPORATION ("GREAT SOURCE") was licensed and/or had license rights issued by the
8 Bureau of Real Estate ("Bureau") as a corporate real estate broker. GREAT SOURCE was
9 originally licensed as a corporate real estate broker on May 17, 2007.

10 3(b) At all times mentioned, Respondent SADRI RIAZATI ("RIAZATI") was
11 licensed and/or had license rights issued by the Bureau as a real estate broker. RIAZATI was
12 originally licensed as a real estate broker on March 3, 2007.

13 3(c) From May 17, 2007, through the present, GREAT SOURCE has been
14 licensed by the Bureau as a corporate real estate broker by and through RIAZATI, as the
15 designated officer and broker responsible, pursuant to Code Section 10159.2, for supervising
16 the activities requiring a real estate license conducted on behalf of GREAT SOURCE, or by
17 GREAT SOURCE's officers, agents and employees.

18 3(d) At all times mentioned, Respondent NEDA FATHI ("FATHI") was
19 licensed and/or had license rights issued by the Bureau as a real estate salesperson. FATHI was
20 originally licensed as a real estate salesperson on July 7, 1998.

21 3(e) From July 22, 2010, through the present, Respondent FATHI was
22 affiliated with employing broker Respondent GREAT SOURCE.

23 BROKERAGE

24 GREAT SOURCE REALTY CORPORATION

25 4.

26 At all times mentioned, in the City of San Diego and City of Escondido, County
27 of San Diego, Respondent GREAT SOURCE acted as a real estate broker, conducting licensed

1 activities within the meaning of Code Section 10131(b) (leases or rents real property for others)
2 and Code Section 10131(d) (solicits borrowers or lenders for or negotiates loans in connection
3 with loans secured by real property).

4 FIRST CAUSE OF ACTION

5 AUDIT

6 GREAT SOURCE REALTY CORPORATION

7 5.

8 On March 30, 2017, the Bureau completed audit examinations of the books and
9 records of Respondent GREAT SOURCE REALTY CORPORATION pertaining to the
10 activities described in Paragraph 4 which require a real estate license. The audit examinations
11 covered a period of time from December 1, 2013, to October 31, 2016. The audit examinations
12 revealed violations of the Code and the Regulations as set forth in the following paragraphs,
13 and as more fully discussed in Audit Reports SD160021 and SD160030 and the exhibits and
14 workpapers attached to said audit reports.

15 AUDIT VIOLATIONS OF THE REAL ESTATE LAW

16 6.

17 In the course of activities described in Paragraph 4 above and during the
18 examination periods described in Paragraph 5 above, Respondents GREAT SOURCE,
19 RIAZATI, and FATHI acted in violation of the Code and the Regulations in that:

20 6(a) A subpoena was served to Respondent RIAZATI for the production of
21 books and records related to the property management activities conducted by Respondents
22 GREAT SOURCE, RIAZATI, and FATHI. GREAT SOURCE and RIAZATI failed to retain
23 and make available for examination, copying, and inspection the books, accounts, and records
24 related to GREAT SOURCE's, RIAZATI's, and FATHI's property management activities for
25 the audit period, in violation of Code Section 10148.

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1 6(b) Respondents GREAT SOURCE and FATHI deposited trust funds into
2 FATHI's personal bank account instead of a trust account, in violation of Code
3 Sections 10145(a), 10145(c), and 10176(e), and Regulation 2832.

4 6(c) Respondents GREAT SOURCE and FATHI deposited trust funds into
5 Respondent GREAT SOURCE's bank account instead of a trust account, in violation of Code
6 Sections 10145(a), 10145(c), and 10176(e), and Regulation 2832.

7 6(d) Respondent GREAT SOURCE did not maintain a complete and accurate
8 control record or general ledger of all trust funds received and disbursed in connection with
9 Respondent's property management activities, in violation of Code Section 10145 and
10 Regulation 2831.

11 6(e) Respondent GREAT SOURCE did not maintain a complete and accurate
12 separate record of all trust funds received and disbursed for each beneficiary in connection with
13 Respondent's property management activities, in violation of Code Section 10145 and
14 Regulation 2831.1.

15 6(f) Respondent GREAT SOURCE did not perform and maintain a monthly
16 reconciliation of all the separate records with the control record of all trust funds received and
17 disbursed, in violation of Code Section 10145 and Regulation 2831.2.

18 6(g) The main office address maintained by Respondent GREAT SOURCE
19 with the Bureau was 16476 Bernardo Center Drive #127, San Diego, CA 92128. Respondent
20 did not maintain an office at this address as early as June 7, 2016. On or about
21 December 12, 2016, Respondent informed the Real Estate Commissioner of a new main office
22 address, which was not previously licensed either as the main office or a branch office. The
23 failure to maintain a place of business for Respondent at 16476 Bernardo Center Drive #127 is
24 in violation Code Section 10162 and Regulation 2715.

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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 the real estate licenses and license rights of Respondents GREAT
4 SOURCE REALTY CORPORATION, SADRI RIAZATI, and NEDA FATHI under the Real
5 Estate Law, for the cost of audit, investigation, and enforcement as permitted by law, and for
6 such other and further relief as may be proper under other applicable provisions of law.
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8 Dated at San Diego, California

9 this 11 day of June, 2017

10
11 V. Kilpatrick
12 Veronica Kilpatrick
13 Supervising Special Investigator

14 cc: GREAT SOURCE REALTY CORPORATION
15 SADRI RIAZATI
16 NEDA FATHI
17 Veronica Kilpatrick
18 Sacto.
19 Audits
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