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**FILED**

**SEP 25 2019**

**DEPT. OF REAL ESTATE**  
By *alldous*

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9 **BEFORE THE DEPARTMENT OF REAL ESTATE**  
10 **STATE OF CALIFORNIA**

11 \* \* \*

12 In the Matter of the Accusation of ) No. H-41499 LA  
13 )  
14 NEXT DOOR PROPERTIES, ) ACCUSATION  
15 a corporation doing business as )  
16 Integra Real Estate Group, )  
17 JORGE VARGAS, individually )  
18 and as former designated officer of )  
19 Next Door Properties, and )  
20 SHIVA MEHRDAD, )  
21 Respondents. )  
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20 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the  
21 State of California, for cause of Accusation against NEXT DOOR PROPERTIES, a corporation  
22 doing business as Integra Real Estate Group, JORGE VARGAS, individually and as former  
23 designated officer of Next Door Properties, and SHIVA MEHRDAD ("Respondents"), is  
24 informed and alleges as follows:

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Accusation of Next Door Properties, Jorge Vargas, and Shiva Mehrdad

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The Complainant, Veronica Kilpatrick, acting in her official capacity as a Supervising Special Investigator of the State of California, makes this Accusation against NEXT DOOR PROPERTIES, JORGE VARGAS, and SHIVA MEHRDAD.

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.

LICENSE HISTORY

3.

Respondent NEXT DOOR PROPERTIES presently has license rights under the Real Estate Law, Part 1 of Division 4 of the Code, as a corporate real estate broker and to do business as Integra Real Estate Group.

4.

Respondent JORGE VARGAS ("VARGAS") presently has license rights as a real estate broker.

5.

On or about June 30, 2016, to on or about January 4, 2019, Respondent NEXT DOOR PROPERTIES was licensed by the Department of Real Estate ("Department") as a corporate real estate broker by and through Respondent VARGAS, as the designated officer and broker responsible, pursuant to Code section 10159.2, for supervising the activities requiring a real estate license conducted on behalf of NEXT DOOR PROPERTIES, or by NEXT DOOR PROPERTIES'S officers, agents and employees. From January 5, 2019, to the present, NEXT DOOR PROPERTIES had no designated officer.

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1 6.

2 Respondent SHIVA MEHRDAD ("MEHRDAD") presently has license rights as  
3 a real estate salesperson. From March 7, 2012, to April 11, 2018, MEHRDAD was affiliated  
4 with employing broker RVN Enterprises Inc. From April 12, 2018, to the present, MEHRDAD  
5 is affiliated with employing broker Power Brokers International Inc.

6 PURCHASE OF 3119 QUEENSBURY DR., LOS ANGELES

7 7.

8 On or about September 16, 2016, buyer Staal Trust, represented by broker  
9 Respondent NEXT DOOR PROPERTIES through agent Respondents VARGAS and  
10 MEHRDAD, submitted an offer to purchase a house at 3119 Queensbury Dr., Los Angeles,  
11 California 90064 ("Queensbury house") through a signed Residential Purchase Agreement.  
12 Paragraph 31 of the Residential Purchase Agreement provided, "EXPIRATION OF OFFER:  
13 This offer shall be deemed revoked and the deposit, if any, shall be returned to Buyer unless the  
14 offer is Signed by Seller and a Copy of the Signed offer is personally received by Buyer, or by  
15 SHIVA MEHRDAD who is authorized to receive it by 5:00 PM on the third Day after this offer  
16 is signed by Buyer".

17 8.

18 On or about October 26, 2016, seller of the Queensbury house Shanks Family  
19 Trust submitted a signed Seller Counter Offer No. 1.

20 9.

21 On or about October 26, 2016, buyer Staal Trust, through Respondent  
22 MEHRDAD, submitted a signed Buyer Counter Offer No. 1. Paragraph 2(A) of the Buyer  
23 Counter Offer No. 1 provided, "EXPIRATION: This Buyer Counter Offer shall be deemed  
24 revoked and the deposits, if any, shall be returned: A. Unless by 5:00pm on the third Day  
25 After the date it is signed in paragraph 3... (i) it is signed in paragraph 4 by Seller and (ii) a  
26 copy of the signed Buyer Counter Offer is personally received by Buyer or SHIVA  
27 MEHRDAD."

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Escrow instructions for the Queensbury house transaction included Instructions to Pay Commission, which provided, "Upon close of escrow, you are instructed to pay the following commission from funds received or held by you on my behalf: \$39,000 to: Integra RE Group, 355 North Canon Drive, Beverly Hills, CA 90210, Agent: Shiva Mehrdad".

11.

On or about December 28, 2016, the Queensbury house transaction closed.

FIRST CAUSE OF ACTION

EMPLOYMENT OF SALESPERSON BY BROKER OTHER THAN BROKER OF RECORD

12.

The conduct, acts, or omissions of Respondents NEXT DOOR PROPERTIES, VARGAS, and MEHRDAD as described in Paragraphs 7 through 11 above, are in violation of Code section 10137, and constitute cause under Code sections 10137, 10177(d), and/or 10177(g) for the suspension or revocation of all the licenses, license endorsements, and license rights of NEXT DOOR PROPERTIES, VARGAS, and MEHRDAD.

SECOND CAUSE OF ACTION

FAILURE TO SUPERVISE

13.

The conduct, acts, or omissions of Respondent VARGAS, as described in Paragraphs 7 through 11 above, in failing to ensure compliance of the Real Estate Law by Respondent NEXT DOOR PROPERTIES, are in violation of Code section 10159.2 and Regulations section 2725 and constitute cause under Code sections 10177(d), 10177(g), and/or 10177(h) for the suspension or revocation of all the licenses and license rights of VARGAS.

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14.

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 NEXT DOOR PROPERTIES, JORGE VARGAS, and SHIVA MEHRDAD 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 San Diego, California

this 10<sup>th</sup> day of September, 2019

  
Veronica Kilpatrick  
Supervising Special Investigator

cc: NEXT DOOR PROPERTIES  
JORGE VARGAS  
SHIVA MEHRDAD  
Power Brokers International Inc DBA Desert Aire Realty, Desert Living, Ivy League Realtors, LA Village Realty, Omni Link Real Estate, Power Brokers International, Real Estate Center  
Veronica Kilpatrick  
Sacto.

Accusation of Next Door Properties, Jorge Vargas, and Shiva Mehrdad