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1.

The Complainant, Veronica Kilpatrick, acting in her official capacity as Supervising Special Investigator of the State of California, makes this First Amended 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.

(License History: TRILLIANT, MARDELLI, and HASHIMI)

3.

a. TRILLIANT is presently licensed by the Department Real Estate as a real estate corporation (license no. 01978323). TRILLIANT was so licensed on or about May 16, 2015 through May 15, 2019 and from or about December 26, 2019 through the present. At no time has TRILLIANT had a fictitious business name registered with the Department of Real Estate. From on or about May 16, 2015 to January 2, 2020, TRILLIANT's designated officer was MARDELLI. From on or about January 2, 2020 to March 4, 2021, TRILLIANT's designated officer was HASHIMI. From on or about March 4, 2021 through the present, TRILLIANT's designated officer has been Wolf V. Parlar (license no. 01797917).)

b. MARDELLI is presently licensed and/or issued by the Department of Real Estate as a real estate broker (license no. 01834969). MARDELLI was originally licensed as a real estate broker on or about November 1, 2007, and has been so licensed since then. At no time has MARDELLI had a fictitious business name registered with the Department of Real Estate. MARDELLI was TRILLIANT's designated officer from on or about May 16, 2015 to January 2, 2020.

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1 c. HASHIMI is presently licensed and/or issued by the Department of Real  
2 Estate as a real estate broker (license no. 01720032). HASHIMI was originally licensed as a  
3 real estate broker on or about May 17, 2008, and has been so licensed since then. HASHIMI  
4 was licensed as a real estate salesperson from on or about November 18, 2006 to May 16, 2008.  
5 From on or about March 18, 2021 through the present, HASHIMI has held an individual MU4  
6 mortgage loan originator (“MLO”) license endorsement (Nationwide Mortgage Licensing  
7 System and Registry (“NMLS”) ID no. 2082271). HASHIMI’s fictitious business name has  
8 been “Americhoice Properties” from on or about April 10, 2017 through the present, “MGS  
9 Properties” from on or about October 16, 2017 to October 12, 2020, and “Property  
10 Management 415” from on or about September 13, 2018 to April 21, 2019. HASHIMI was  
11 TRILLIANT’s designated officer from on or about January 2, 2020 to March 4, 2021.

12 4.

13 Whenever acts referred to below are attributed to TRILLIANT, MARDELLI,  
14 and/or HASHIMI, those acts are alleged to have been done by TRILLIANT, MARDELLI,  
15 and/or HASHIMI, acting by itself/herself/themselves, or by and/or through one or more agents,  
16 associates, affiliates, and/or co-conspirators.

17 5.

18 At all times mentioned, in the County of Los Angeles, TRILLIANT,  
19 MARDELLI, and HASHIMI were engaged in the business of a real estate broker conducting  
20 licensed activities within the meaning of Code section 10131(b) (“[l]eases or rents or offers to  
21 lease or rent, or places for rent, or solicits listings of places for rent, or solicits for prospective  
22 tenants, or negotiates the sale, purchase, or exchanges of leases on real property, or on a  
23 business opportunity, or collects rents from real property, or improvements thereon, or from  
24 business opportunities”).

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(Property Management Audit)

6.

On or about September 28, 2021, the Department of Real Estate completed an audit examination of the books and records of TRILLIANT to determine whether TRILLIANT, MARDELLI, and HASHIMI handled and accounted for trust funds and conducted their real estate activities in accordance with the Real Estate Law and Regulations. The audit examination covered a period of time beginning on January 1, 2019 and ending on February 28, 2021. The audit examination revealed violations of the Code and the Regulations set forth in the following paragraphs, and more fully discussed in Audit Report LA200109 and the exhibits and work papers attached to said audit report.

Bank Accounts

7.

At all times mentioned, in connection with the activities described in Paragraph 5, above, TRILLIANT, MARDELLI, and HASHIMI accepted or received funds including funds in trust (“trust funds”) from or on behalf of actual or prospective parties, such as owners of real property, and thereafter made deposits and/or disbursements of such funds. From time to time herein mentioned, during the audit period, said trust funds were deposited and/or maintained by TRILLIANT, MARDELLI, and HASHIMI in the following bank accounts:

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1 \*\*\*\*\*7653  
2 Chase Bank  
3 P.O. Box 182051  
4 Columbus, OH 43218 B/A 1  
(MARDELLI from January 1, 2019 to January 2, 2020)  
(HASHIMI from January 3, 2020 to February 28, 2021)

5 \*\*\*\*\*7377  
6 Chase Bank  
7 P.O. Box 182051  
8 Columbus, OH 43218 B/A 2  
(MARDELLI from January 1, 2019 to January 2, 2020)  
(HASHIMI from January 3, 2020 to February 28, 2021)

9 \*\*\*\*\*3833  
10 Chase Bank  
11 P.O. Box 182051  
12 Columbus, OH 43218 B/A 3  
(MARDELLI from January 1, 2019 to January 2, 2020)

13 \*\*\*\*\*3791  
14 Chase Bank  
15 P.O. Box 182051  
16 Columbus, OH 43218 B/A 4  
(MARDELLI from January 1, 2019 to January 2, 2020)

17 \*\*\*\*\*7195  
18 Chase Bank  
19 P.O. Box 182051  
20 Columbus, OH 43218 B/A 5  
(HASHIMI from January 3, 2020 to February 28, 2021)

21 \*\*\*\*\*7211  
22 Chase Bank  
23 P.O. Box 182051  
24 Columbus, OH 43218 B/A 6  
(HASHIMI from January 3, 2020 to February 28, 2021)

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1 8.

2 In the course of activities described in Paragraphs 5 and 7, above, and during the  
3 audit examination period in Paragraph 6, above, Respondents TRILLIANT, MARDELLI, and  
4 HASHIMI acted in violation of the Code and the Regulations as set forth below:

5 (a)(1) From on or about January 1, 2019 to January 2, 2020, TRILLIANT and  
6 MARDELLI failed to maintain a complete columnar record of all trust funds received and  
7 disbursed (control record) for B/A 1, in violation of Code section 10145 and Regulations  
8 section 2831. For example, the record did not have the dates of receipt of the trust funds.

9 (a)(2) From on or about January 3, 2020 to February 28, 2021, TRILLIANT  
10 and HASHIMI failed to maintain a complete columnar record of all trust funds received and  
11 disbursed (control record) for B/A 1, in violation of Code section 10145 and Regulations  
12 section 2831. For example, the record did not have the dates of receipt of the trust funds.

13 (b)(1) From on or about January 1, 2019 to January 2, 2020, TRILLIANT and  
14 MARDELLI failed to designate B/A 1, B/A 2, B/A 3, and B/A 4 as trust accounts even though  
15 they held trust funds, in violation of Code section 10145 and Regulations section 2832.

16 (b)(2) From on or about January 3, 2020 to February 28, 2021, TRILLIANT  
17 and HASHIMI failed to designate B/A 1, B/A 2, B/A 3, and B/A 5 as trust accounts even  
18 though they held trust funds, in violation of Code section 10145 and Regulations section 2832.

19 (c)(1) From on or about January 1, 2019 to January 2, 2020, TRILLIANT and  
20 MARDELLI permitted Meighan Howard, an unlicensed and unbonded person, to be an  
21 authorized signatory for B/A 2, in violation of Code section 10145 and Regulations section  
22 2834.

23 (c)(2) From on or about January 3, 2020 to February 28, 2021, TRILLIANT  
24 and HASHIMI permitted Meighan Howard, Josef Nikolas Kanapi, and Luana Kaye Parker  
25 (secretary of TRILLIANT and 50 percent shareholder of TRILLIANT<sup>1</sup>), all unlicensed and  
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27 <sup>1</sup> Lisa Collins is the president and the other 50 percent shareholder of TRILLIANT.

1 unbonded persons, to be authorized signatories for B/A 2 and B/A 5, in violation of Code  
2 section 10145 and Regulations section 2834.

3 (d)(1) From on or about January 1, 2019 to January 2, 2020, the overall conduct  
4 of Respondent TRILLIANT constitutes a failure on Respondent MARDELLI's part, as officer  
5 designated by a corporate broker licensee, to exercise the reasonable supervision and control  
6 over the licensed activities of TRILLIANT as required by Code section 10159.2 and  
7 Regulations section 2725.

8 (d)(2) From on or about January 3, 2020 to February 28, 2021, the overall  
9 conduct of Respondent TRILLIANT constitutes a failure on Respondent HASHIMI's part, as  
10 officer designated by a corporate broker licensee, to exercise the reasonable supervision and  
11 control over the licensed activities of TRILLIANT as required by Code section 10159.2 and  
12 Regulations section 2725.

13 9.

14 The conduct of Respondents TRILLIANT, MARDELLI, and HASHIMI  
15 described in Paragraph 8, above, violated the Code and the Regulations as set forth below:

<u>PARAGRAPH</u>	<u>PROVISIONS VIOLATED</u>
17 8(a)	Code section 10145 and Regulations section 2831
18 8(b)	Code section 10145 and Regulations section 2832
19 8(c)	Code section 10145 and Regulations section 2834
20 8(d)	Code section 10159.2 and Regulations section 2725

21 The foregoing violations constitute cause for discipline of the real estate license and license  
22 rights of Respondents TRILLIANT, MARDELLI, and HASHIMI under the provisions of Code  
23 sections 10177(d), 10177(g), and 10177(h).

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WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this First Amended Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against the licenses and license rights, including, but not limited to, MLO license endorsements, if any, of TRILLIANT, CHRISTIAN ALEXANDER MARDELLI, individually and as designated officer of Trilliant, and MASSIEH SAYED HASHIMI, individually and as designated officer of Trilliant, under the Real Estate Law (Part 1 of Division 4 of the California Business and Professions Code), for the cost of investigation and enforcement pursuant to Code section 10106 and as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law, including, but not limited to, costs of audit pursuant to Code section 10148(b).

Dated at San Diego, California: May 3, 2022 .

*V Kilpatrick*  
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Veronica Kilpatrick  
Supervising Special Investigator

cc: Trilliant  
Christian Alexander Mardelli  
Massieh Sayed Hashimi  
Wolf V. Parlar  
Veronica Kilpatrick  
Sacto  
Enforcement  
Audits – Raymond Chow