

KYLE T. JONES, Counsel (SBN 300751)
Department of Real Estate
651 Bannon Street, Suite 507
Sacramento, CA 95811

Telephone: (916) 576-8700
(916) 263-3767 (Fax)
(916) 737-4389 (Direct)

FILED

MAY 23 2025

DEPARTMENT OF REAL ESTATE
By B. Nicholas

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of:	)	
	)	No. H-3612 FR
IRTIZA NAQVI,	)	
	)	
	)	<u>ACCUSATION</u>
Respondent.	)	
	)	

The Complainant, RUBEN CORONADO, acting in his official capacity as a Supervising Special Investigator of the State of California, for this Accusation against IRTIZA NAQVI ("Respondent"), is informed and alleges as follows:

1

At all times mentioned herein, Respondent was and is presently licensed by the Department of Real Estate ("Department"), under the California Business and Professions Code ("Code") as a salesperson, License No. 02053034.

2

At all times mentioned herein, Respondent was employed by Joyson Therampilly John ("John"), License No. 02001087.

///

///

///

1 3

2 At all times mentioned, Respondent engaged in the business within the meaning
3 of Section 10131(a) of the Code, including the operation and conduct of a residential resale
4 brokerage wherein Respondent bought, sold, or offered to buy or sell, solicited, or obtained
5 listings of, and/or negotiated the purchase, sale or exchange of real property or business
6 opportunities, on behalf of others, all for or in expectation of compensation.

7 4

8 Whenever acts referred to below are attributed to Respondent, those acts are
9 alleged to have been done by Respondent, acting by himself, or by and/or through one or more
10 known or unknown agents, associates, and/or co-conspirators.

11 5

12 On or about May 26, 2022, a purchase agreement was executed between the
13 owner of the property located at 386 East Hillcrest Avenue, Fresno, CA 93720 ("Hillcrest
14 Avenue"), B.R. ("Seller"), and the prospective purchaser, A.G. ("Buyer"), with Respondent
15 acting as a dual agent. B.R. is Respondent's wife and Hillcrest Avenue was her sole and
16 separate property. No listing agreement was executed between Respondent and Seller. Both
17 Seller and Respondent resided in Hillcrest Avenue at the time the offer was accepted.

18 6

19 On or about October 17, 2022, escrow for the sale of Hillcrest Avenue closed
20 transferring ownership from Seller to Buyer. During the sales process for Hillcrest Avenue,
21 Respondent failed to provide John with copies of documents as required by John's policies and
22 procedures. Respondent had an obligation to submit documents to John for review and/or
23 approval, within 5 days after a document is prepared, or if escrow is scheduled to close within 5
24 days after the document is prepared, not later than prior to the close of escrow. By failing to
25 provide John copies of documents as required, Respondent acted outside the scope of his
26 employment with John and acted as a broker in violation of Section 10130 of the Code.

27 ///

1 7

2 Respondent failed to provide Buyer a Transfer Disclosure Statement prior to the
3 close of escrow as required by Section 1102 et seq. of the Civil Code and section 10176.5 of the
4 Code.

5 8

6 Respondent failed to provide Buyer an Agent Visual Inspection disclosure prior
7 to the close of escrow as required by Section 2079 et seq. of the Civil Code.

8 9

9 Respondent breached his fiduciary duty to Buyer by failing to provide required
10 disclosures prior to the close of escrow.

11 GROUND FOR DISCIPLINE

12 10

13 The acts and/or omissions as described above in Paragraphs 1-10, above,
14 constitute grounds for the suspension or revocation of the license and license rights of the
15 Respondent pursuant to Sections 10177(d) (willful disregard or violation of real estate law),
16 10176(i) (fraud or dishonest dealing), 10176.5 (willfully fail to provide transfer disclosure
17 statement), 10177(g) (negligence or incompetence), and/or 10177(j) (fraud or dishonest
18 dealing) of the Code.

19 COST RECOVERY

20 11

21 The Department will seek to recover the costs of the investigation and prosecution
22 of this case pursuant to Section 10106 of the Code which provides, in pertinent part, that in any
23 order issued in resolution of a disciplinary proceeding before the Department, the Commissioner
24 may request the administrative law judge to direct a licensee found to have committed a violation
25 of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement
26 of the case.

27 ///

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 licenses and license rights of Respondent 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 provisions of law.

RUBEN CORONADO
Supervising Special Investigator

Dated at Fresno, California,
this _____ day of _____, 2025.

DISCOVERY DEMAND

Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the Department hereby makes demand for discovery pursuant to the guidelines set forth in the *Administrative Procedure Act*. Failure to provide Discovery to the Department may result in the exclusion of witnesses and documents at the hearing or other sanctions that the Office of Administrative Hearings deems appropriate.