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**FILED**

OCT 09 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, )  
 )  
 ) ACCUSATION  
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:

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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.

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

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

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

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

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

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

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

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

#### GROUND FOR DISCIPLINE

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

#### COST RECOVERY

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The Department will seek to recover the costs of the investigation and prosecution of this case pursuant to Section 10106 of the Code which provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, 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.

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1                   WHEREFORE, Complainant prays that a hearing be conducted on the allegations  
2 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary  
3 action against all licenses and license rights of Respondent under the Real Estate Law, for the  
4 cost of investigation and enforcement as permitted by law, and for such other and further relief  
5 as may be proper under other provisions of law.

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7   
8 RUBEN CORONADO  
9 Supervising Special Investigator

10 Dated at Fresno, California,  
11 this 8th day of October, 2025.

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14 DISCOVERY DEMAND

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