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**FILED**  
APR 30 2026  
DEPT. OF REAL ESTATE  
By- [REDACTED]

8 BEFORE THE DEPARTMENT OF REAL ESTATE  
9 STATE OF CALIFORNIA

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11 In the Matter of the Accusation of	No. H-05946-SD
12 YOUSIF HATTAB,	<u>ACCUSATION</u>
13 Respondent.	

14 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator for the  
15 Department of Real Estate (“Department” or “DRE”) of the State of California, for cause of  
16 Accusation against YOUSIF HATTAB, also known as Yousif Samim Najeeb Hattab, Yousif  
17 Samimnajeeb Hattab, and Yousif Samir Hattab (“Respondent”), is informed and alleges in her  
18 official capacity as follows:

19 1. The Complainant, Veronica Kilpatrick, acting in her official capacity as a  
20 Supervising Special Investigator, makes this Accusation against Respondent.

21 LICENSE HISTORY

22 2. Respondent has been licensed by the DRE as a real estate salesperson (“RES”), DRE  
23 license identification number 02052851, from on or about May 31, 2018, through the present, with  
24 Respondent’s license scheduled to expire on or about May 30, 2026, unless renewed. According to  
25 DRE records to date, between March 21, 2022 and the present, Respondent changed his responsible  
26 broker four times, and his RES license has been affiliated with the following real estate corporations  
27 (“REC”) and real estate brokers (“REB”):

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Name of REC or REB	License ID	Dates of Respondent's Affiliation
NetWorth Realty Of San Diego, Inc.	02004088	03/21/2022 to 06/07/2024
Big Block Realty, Inc.	01885775	09/05/2024 to 12/13/2024
Networth Realty of Los Angeles, Inc.	02021338	12/17/2024 to 05/15/2025
Ashmeet Singh Kohli	02245844	05/16/2025 to 05/21/2025
NetWorth Realty Of San Diego, Inc.	02004088	05/22/2025 to present

FIRST CAUSE OF ACCUSATION

(CRIMINAL CONVICTION)

3. On or about November 16, 2022, in the Superior Court of California for Orange County, in the case of *The People of the State of California v. Yousif Samim Najeeb Hattab*, Case No. 22HF2321 (“Case No. 22HF2321”), a Felony Complaint was filed against respondent charging him with violations of:

- a. Penal Code section 273a(a) (child abuse against Child Doe), a felony (Count 1);
- b. Penal Code section 245(a)(2) (assault with a firearm against Javier S.), a felony (Count 2);
- c. Penal Code section 417.3 (brandishing at person in motor vehicle (Clarissa C.)), a felony (Count 3);
- d. Penal Code section 594, subdivisions (a) and (b)(1) (vandalism – damage of \$400 or more), a felony (Count 4);
- e. Penal Code section 25400, subdivisions (a)(1) and (c)(7) (concealed firearm in vehicle), a misdemeanor (Count 5).

4. An Enhancement was further alleged in the Felony Complaint, as to Counts 1 through 3, pursuant to Penal Code section 12022.5(a) (personal use of firearm), and within the meaning of Penal Code section 1192.7 and 667.5, that Respondent personally used a firearm in the commission and attempted commission of the above offenses.

5. On or about October 17, 2023, in Case No. 22HF2321, the Felony Complaint was amended by interlineation to only change the victim’s name in Count 2 to Clarissa C, but otherwise alleged the same four (4) felony counts as the Felony Complaint filed on or about November 16, 2022.

1           6.       On or about October 20, 2023, in the Superior Court of California for Orange County,  
2 in Case No. 22HF2321, an Information was filed against Respondent charging him with the same  
3 five (5) counts that were alleged in the Felony Complaint, again alleging that the victim in Count 2  
4 was Javier S., and alleging the same Enhancement as in the Felony Complaint.

5           7.       On or about August 2, 2024, in Case No. 22HF2321, a First Amended Information  
6 was filed against Respondent charging him with violations of:

7                   a.       Penal Code section 273a(a) (child abuse against Child Doe 1), a felony  
8 (Count 1);

9                   b.       Penal Code section 273a(a) (child abuse against Child Doe 2), a felony  
10 (Count 2);

11                   c.       Penal Code section 245(b) (assault with a semiautomatic firearm against  
12 Clarissa C.), a felony (Count 3);

13                   d.       Penal Code section 245(b) (assault with a semiautomatic firearm against  
14 Child Doe 1), a felony (Count 4);

15                   e.       Penal Code section 245(b) (assault with a semiautomatic firearm against  
16 Child Doe 2), a felony (Count 5);

17                   f.       Penal Code section 417.3 (brandishing firearm at person in motor vehicle  
18 (Clarissa C.)), a felony (Count 6);

19                   g.       Penal Code section 594, subdivisions (a) and (b)(1) (vandalism – damage of  
20 \$400 or more (deface, damage, and destroy vehicle of Javier S. and Clarissa C.)), a felony  
21 (Count 7);

22                   h.       Penal Code section 25400, subdivisions (a)(1) and (c)(7) (concealed firearm  
23 in vehicle), a misdemeanor (Count 8).

24           8.       An Enhancement was further alleged in the First Amended Information pursuant to  
25 Penal Code section 12022.5(a) (personal use of firearm), and within the meaning of Penal Code  
26 section 1192.7 and 667.5, that Respondent personally used a firearm in the commission and  
27 attempted commission of the above offenses.

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1           9.       On or about April 28, 2025, in Case No. 22HF2321, a Second Amended Information  
2 was filed against Respondent charging him with the same eight (8) counts that were alleged in the  
3 First Amended Information, but omitting the Enhancement alleged in the First Amended  
4 Information, and adding allegations regarding factors in aggravation as to Counts 1 through 7.

5           10.       On or about June 24, 2025, in Case No. 22HF2321, a Third Amended Information  
6 was filed against Respondent charging him with violations of:

7                   a.       Penal Code section 273a(a) (child abuse against Child Doe 1), a felony  
8 (Count 1);

9                   b.       Penal Code section 273a(a) (child abuse against Child Doe 2), a felony  
10 (Count 2);

11                  c.       Penal Code section 245(b) (assault with a semiautomatic firearm against  
12 Clarissa C.), a felony (Count 3);

13                  d.       Penal Code section 245(b) (assault with a semiautomatic firearm against  
14 Child Doe 1), a felony (Count 4);

15                  e.       Penal Code section 245(b) (assault with a semiautomatic firearm against  
16 Child Doe 2), a felony (Count 5);

17                  f.       Penal Code section 594, subdivisions (a) and (b)(1) (vandalism – damage of  
18 \$400 or more), a felony (Count 6). Count 6 alleged in pertinent part that Respondent “did  
19 maliciously and unlawfully deface with graffiti and other inscribed material, damage, and  
20 destroy 2021 Toyota Tacoma, real and personal property belonging to Javier S. & Clarissa  
21 C., in the amount of four hundred dollars (\$400) and more.”

22       11.       An Enhancement was further alleged in the Third Amended Information:

23                   a.       As to Counts 1 and 2, pursuant to Penal Code section 12022.5, subdivision  
24 (a) (personal use of firearm), and within the meaning of Penal Code section 1192.7 and  
25 667.5, that Respondent personally used a firearm in the commission and attempted  
26 commission of the above offenses;

27                   b.       As to Counts 3 through 5, pursuant to Penal Code section 12022.5,  
28 subdivisions (a) and (d) (personal use of firearm), and within the meaning of Penal Code

1 section 1192.7 and 667.5, that Respondent personally used a firearm in the commission  
2 and attempted commission of the above aggravated offenses.

3 12. On or about June 30, 2025, in Case No. 22HF2321, a jury found Respondent guilty  
4 as to Count 6 as charged in the Third Amended Information, convicting Respondent of violation of  
5 Penal Code section 594, subdivisions (a) and (b)(1) (vandalism – damage of \$400 or more), a felony.

6 13. On or about October 3, 2025, in Case No. 22HF2321, the court suspended imposition  
7 of sentence and placed Respondent on two (2) years formal probation subject to terms and conditions  
8 including but not limited to: serving 30 days jail time, with credit for two (2) days, with authorization  
9 for jail to be served as weekends; paying a restitution fine, an assessment, fees, and restitution to the  
10 victims; violating no laws; not directly or indirectly initiating contact with, nor having any  
11 communication with the victims; and completing an Anger Management Program.

12 14. The conviction, as described in Paragraph 12 above, bears a substantial relationship  
13 under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications,  
14 functions, or duties of a real estate licensee.

15 15. The crime for which Respondent was convicted, as described in Paragraphs 10  
16 through 12 above, constitutes cause under California Business Code (“Code”) sections 490 and  
17 10177(b) for the suspension or revocation of the license and license rights of Respondent under the  
18 Real Estate Law.

19 SECOND CAUSE OF ACCUSATION

20 (FAILURE TO REPORT FELONY CHARGES AND CONVICTION)

21 16. Complainant realleges and incorporates by reference all of the allegations contained  
22 in the previous paragraphs as though fully set forth herein.

23 17. Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, “The  
24 bringing of a criminal complaint, information, or indictment charging a felony against the licensee,”  
25 and “The conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest,  
26 of any felony or misdemeanor” to the Department within thirty (30) days of the of the date of the  
27 bringing of the complaint or information charging a felony, and of the conviction.

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1 18. Respondent failed to report in writing to the Department within 30 days of:

2 a. The bringing of a criminal complaint or information charging felonies against  
3 Respondent in Case No. 22HF2321, as described in Paragraphs 5 through 11 above,  
4 including:

5 (1) The four (4) felony counts alleged in the Amended Felony Complaint  
6 filed on October 17, 2023;

7 (2) The four (4) felony counts alleged in the Information filed on October  
8 20, 2023;

9 (3) The seven (7) felony counts alleged in the First Amended Information  
10 filed on August 2, 2024;

11 (4) The seven (7) felony counts alleged in the Second Amended Information  
12 filed on April 28, 2025; and

13 (5) The six (6) felony counts alleged in the Third Amended Information  
14 filed on June 24, 2025.

15 b. Respondent's conviction on June 30, 2025, in Case No. 22HF2321, as  
16 described in Paragraph 12 above.

17 19. In aggravation, Respondent failed to report in writing to the Department within 30  
18 days of the filing of the Felony Complaint on November 16, 2022, in Case No. 22HF2321, alleging  
19 four (4) felony counts.

20 20. Respondent's failure to report in writing within 30 days of the dates of the bringing  
21 of a criminal complaint or information charging felonies against Respondent, and of his conviction,  
22 violates Code section 10186.2 and constitutes cause under Code sections 10186.2 and 10177(d)  
23 and/or 10177(g) for the suspension or revocation of the license and license rights of Respondent  
24 under the Real Estate Law.

25 COSTS

26 (COSTS OF INVESTIGATION AND ENFORCEMENT)

27 21. California Business and Professions Code section 10106, provides, in pertinent part,  
28 that in any order issued in resolution of a disciplinary proceeding before the Department of Real

1 Estate, the Commissioner may request the administrative law judge to direct a licensee found to  
2 have committed a violation of this part to pay a sum not to exceed the reasonable costs of the  
3 investigation and enforcement of the case.

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

9  
10 Dated April 30, 2026, at San Diego, California.

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13 Veronica Kilpatrick  
14 Supervising Special Investigator

15 cc: YOUSIF HATTAB  
16 NetWorth Realty Of San Diego, Inc.  
17 Veronica Kilpatrick  
18 Sacto.

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