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**FILED**  
SEP 17 2021  
DEPARTMENT OF REAL ESTATE  
By J. Taggart

8 BEFORE THE DEPARTMENT OF REAL ESTATE  
9 STATE OF CALIFORNIA

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11 In the Matter of the Accusation of )  
12 ) NO. H-7080 SAC  
13 INNOVATIVE PROPRIETARY ADVISORS, INC., )  
14 DEANNA CHRISTINE CHAVIS, )  
15 JESSICA MARIE PARKER, and )  
16 DARRICK JONATHAN CHAVIS, )  
17 Respondents. ) ACCUSATION

17 The Complainant, TRICIA D. PARKHURST, a Supervising Special Investigator  
18 of the State of California, for cause of Accusation against INNNOVATIVE PROPRIETARY  
19 ADVISORS, INC. (IPA), DEANNA CHRISTINE CHAVIS (DEANNA), JESSICA MARIE  
20 PARKER (PARKER) and DARRICK JONATHAN CHAVIS (DARRICK), collectively referred  
21 to as RESPONDENTS, is informed and alleges as follows:

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23 The Complainant makes this Accusation in her official capacity.

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25 At all times herein mentioned, IPA was and is presently licensed and/or has  
26 license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and

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1 Professions Code (the Code) by the Department of Real Estate (the Department) as a corporate  
2 real estate broker.

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4 All times herein mentioned, DEANNA was and is presently licensed and/or has  
5 license rights as a real estate broker.

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7 At all times herein mentioned, PARKER was and is presently licensed and/or has  
8 license rights as a real estate broker.

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10 At all times herein mentioned, DARRICK was and is presently licensed and/or  
11 has license rights as a real estate salesperson.

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13 At all times herein mentioned, DEANNA was licensed by the Department as the  
14 designated officer of IPA. As the designated officer, DEANNA was responsible, pursuant to  
15 Section 10159.2 of the Code, for the supervision of the activities of the officers, agents, real  
16 estate licensees and employees of IPA for which a real estate license is required.

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18 Whenever reference is made in an allegation in this Accusation to an act or  
19 omission or IPA, such allegation shall be deemed to also mean that DEANNA committed such  
20 act or omission while engaged in furtherance of the business or operation of IP, and while acting  
21 within the course and scope of her employment.

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23 At all times mentioned, RESPONDENTS engaged in the business of, acted in the  
24 capacity of, advertised or assumed to act as a real estate broker in the State of California, within  
25 the meaning of Section 10131(a) of the Code, including the operation and conduct of a  
26 residential resale brokerage wherein RESPONDENTS bought, sold, or offered to buy or sell,

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1 solicited or obtained listings of, and negotiated the purchase, sale or exchange of real property or  
2 business opportunities, all for or in expectation of compensation.

3 FIRST CAUSE OF ACTION

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5 Complainant refers to Paragraphs 1 through 8 above, and incorporates them  
6 herein, by reference.

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8 On or about July 25, 2017, DEANNA, on behalf of IPA, purchased a duplex  
9 commonly known as 1208/1210 Florida Street, Vallejo, California (Florida Property). IPA  
10 purchased the property, which was in dilapidated condition, from the City of Vallejo.

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12 DARRICK and his company INNOVATIVE PROPRIETARY ADVISORS  
13 CONSTRUCTION, INC. (IPACON), performed substantial renovation to the 1210 Florida  
14 Property. DARRICK obtained approval from the City of Vallejo to split the Florida Property  
15 into two separate units.

16 12

17 Most of the renovations performed by IPACON, such as the interior remodeling  
18 and basement conversion into living space, was done without obtaining the necessary permits  
19 from the City of Vallejo. Permits were obtained only for the front porch replacement and new  
20 electrical service.

21 13

22 On or about August 17, 2018, PARKER, acting on behalf of IPA listed the 1210  
23 Vallejo Property on the Multiple Listing Service (MLS). In the listing, PARKER represented  
24 that "all work done with permits".

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On or about September 4, 2018, Christian Butler (Buyer) entered into a Residential Purchase Agreement for the 1210 Florida Property. Buyer was represented by DARRICK, acting on behalf of IPA, who was also the selling agent.

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DARRICK failed to advise Buyer of the lack of permits for the construction work on the 1210 Florida Property.

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DEANNA, acting on behalf of IPA, failed to advise Buyer of the lack of permits for the construction work on the 1210 Florida Property.

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On or about September 28, 2018, escrow closed on the 1210 Florida Property and Buyer became the owner.

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On or about June 11, 2019, Steve Arnold, Chief Building Officer for the City of Vallejo, issued a Correction Notice to Buyer. The Correction Notice indicated that the interior remodel and basement conversion on the 1210 Florida Property were done without permits and directed Buyer to submit plans, an application and fees for inspection work. This is the first time that Buyer heard that the construction on the 1210 Florida Property was done without permits.

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On or about August 1, 2021 PARKER provided a statement that alleged that all of the construction work done on the 1210 Florida Property was done with permits.

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Buyer obtained an estimate for the correction work and fees which amounted to \$50,000.

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The acts or omissions of RESPONDENTS as alleged above, above violate Sections 10176(a) (material misrepresentation), 10176(b) (false promises to induce, persuade, induce), 10176(i) (other conduct/fraud or dishonest dealing), and 10177(j) (other conduct fraud/dishonest dealing) of the Code and are grounds for the suspension or revocation of the licenses and license rights of RESPONDENTS under Sections 10176(a), 10176(b), 10176(i) and 10177(j) of the Code.

SECOND CAUSE OF ACTION

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Complainant refers to Paragraphs 1 through 21, above, and incorporates them herein, by reference.

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At all times herein above mentioned, DEANNA, was responsible as the supervising broker for IPA, for the supervision and control of the activities conducted on behalf of IPA's business by its employees. DEANNA failed to exercise reasonable supervision and control over the property management activities of IPA. In particular, IPA permitted, ratified and/or caused the conduct described above, to occur, and failed to take reasonable steps, including but not limited to handling of trust funds, supervision of employees, and the implementation of policies, rules, and systems to ensure the compliance of the business with the Real Estate Law and the Regulations.

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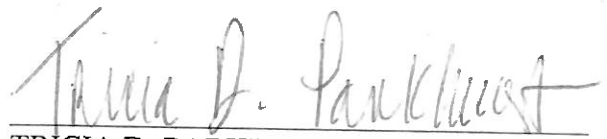
The above acts and/or omissions of DEANNA violate Section 10159.2 (broker supervision) of the Code and Section 2725 (broker supervision) of the Regulations and constituted grounds for disciplinary action under the provisions of Sections 10177(d), 10177(g) and 10177(h) of the Code:

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Section 10106 of the Code 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.

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 Code, for the reasonable costs of investigation and prosecution of this case, including agency attorney's fees, and for such other and further relief as may be proper under other provisions of law.

  
TRICIA D. PARKHURST  
Supervising Special Investigator

Dated at Sacramento, California,  
this 17<sup>th</sup> day of September, 2021.

DISCOVERY DEMAND

The Department of Real Estate hereby requests discovery pursuant to Section 11507.6 of the California Government Code. Failure to provide discovery to the Department may result in the exclusion of witnesses and/or documents at the hearing, and other sanctions as the Administrative Law Judge deems appropriate.