

**FILED**

**JUN 20 2024**

**DEPARTMENT OF REAL ESTATE**  
By J. Laggar

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8 **BEFORE THE DEPARTMENT OF REAL ESTATE**  
9 **STATE OF CALIFORNIA**

10 \* \* \*

11 In the Matter of the Accusation of )  
12 DIPESH RAWAL, ) NO. H-12734 SF  
13 Respondent. ) ACCUSATION  
14 )

15 The Complainant, STEPHANIE YEE, a Supervising Special Investigator of the  
16 State of California for cause of Accusation against DIPESH RAWAL, Respondent, is informed  
17 and alleges as follows:

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19 The Complainant makes this Accusation in her official capacity.

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21 At all times herein mentioned, RAWAL was and is presently licensed and/or has  
22 license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and  
23 Professions Code (the Code) by the Department of Real Estate (the Department), License ID  
24 02072685.

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26 On October 14, 2020, RAWAL was issued a real estate salesperson license by  
27 the Department.

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On June 8, 2023, RAWAL was issued a real estate broker license by the Department.

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At all relevant times herein mentioned in this Accusation, Respondent engaged in the business of, acted in the capacity of, advertised, or assumed to act as a real estate salesperson within the State of California within the meaning of Section 10131(d) of the Code, including the operation and conduct of a loan brokerage business with the public wherein, on behalf of others, for compensation or in expectation of compensation, Respondent solicited lenders and borrowers for loans secured directly or collaterally by liens on real property.

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Beginning in 2021, Respondent began to refer clients to Avinash Sondhi (Sondhi), a Department of Financial and Protection Innovation (DFPI) licensed mortgage loan originator.

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In or around June or July, 2021, Respondent created a pre-qualification letter, dated July 4, 2021, for Harish S., using a letter from Sondhi that Respondent had previously received, as a template for the Harish S. pre-qualification letter. The pre-qualification letter was prepared without the authority or knowledge of Sondhi.

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On or about July 24, 2021, Respondent emailed a Residential Purchase Agreement on behalf of Harish S., buyer, for that certain real property commonly known as 2491 Erickson Street, Sacramento, CA 95815 (Erickson Property). Respondent also emailed the fabricated pre-qualification letter referred to above, in Paragraph 7, as part of the offer.

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On or about July 25, 2021, the sellers of the Erickson Property accepted the offer.

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On or about August 20, 2021, real estate salesperson, Gilbert Howerton (Howerton), who represented buyers of the Erickson Property, contacted Sondhi regarding the loan status.

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It was through this contact that Sondhi learned that Respondent fabricated a pre-qualification letter on Sondhi's letterhead that Respondent submitted in the offer to purchase the Erickson Property. Howerton forwarded a copy of the fabricated letter to Sondhi.

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Sondhi began to communicate with Respondent on August 20, 2021 about the fabricated pre-qualification letter. Respondent admitted on or about August 27, 2021, that he had fabricated the letter for the buyer of the Erickson Property. Respondent further admitted that he had fabricated an additional prequalification letter for borrower Santosh J, dated June 27, 2021.

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The prequalification letters on behalf of Harish S. and Santosh J. were untrue and Respondent knew them to be untrue at the time he made them and were for the purpose of submitting offer(s) and getting fees.

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The true facts were that Respondent did not refer either borrower to Sondhi and that the letters were not prepared by Sondhi.

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The acts and/or omissions alleged above violate Sections 10176(a) (material misrepresentation), 10176(b) (false promises to influence, persuade, or 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

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1 Respondent under Sections 10176(a), 10176(b), 10176(i), 10177(d) (violate real estate law) and  
2 10177(j) of the Code.

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4 Section 10106 of the Code provides, in pertinent part, that in any order issued in  
5 resolution of a disciplinary proceeding before the Department, the commissioner may request the  
6 administrative law judge to direct a licensee found to have committed a violation of this part to  
7 pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

8 WHEREFORE, Complainant prays that a hearing be conducted on the allegations  
9 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary  
10 action against all licenses and license rights of Respondent under the Code, for the reasonable  
11 costs of investigation and prosecution of this case, including agency attorney's fees, and for such  
12 other and further relief as may be proper under other provisions of law.

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17 STEPHANIE YEE

18 Supervising Special Investigator

19 Dated at Oakland, California,  
20 this 20th day of June, 2024.

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22 DISCOVERY DEMAND

23 The Department of Real Estate hereby requests discovery pursuant to Section  
24 11507.6 of the California Government Code. Failures to provide discovery to the Department  
25 may result in the exclusion of witnesses and/or documents at the hearing, and other sanctions as  
26 the Administrative Law Judge deems appropriate.