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**FILED**

SEP 09 2025

DEPT. OF REAL ESTATE

By—

BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of	)	No. H-43039 LA
	)	
	)	
REAL ESTATE HEAVEN	)	
INTERNATIONAL, INC., and	)	
	)	<u>ACCUSATION</u>
PAUL RAYMOND ARGUETA,	)	
individually and as designated officer of	)	
Real Estate Heaven International, Inc.,	)	
	)	
Respondents.	)	
	)	

The Complainant, Ray Dagnino, a Supervising Special Investigator of the State of California for cause of Accusation against Respondents REAL ESTATE HEAVEN INTERNATIONAL, INC. ("REHII") and PAUL RAYMOND ARGUETA ("ARGUETA"), individually and as designated officer of Real Estate Heaven International, Inc., is informed and alleges as follows:

1.

The Complainant, Ray Dagnino, a Supervising Special Investigator of the State of California, makes this Accusation in his official capacity.

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2.

All references to the "Code" are to the California Business and Professions Code, and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations unless otherwise specified.

(LICENSE HISTORY)

3.

REHII is presently licensed and/or has license rights under the Real Estate Law as a corporate real estate broker (license number 01945994). REHII was originally licensed on or about January 9, 2014, and has been so licensed since then. REHII's designated officer has been ARGUETA from on or about April 8, 2019 through the present.<sup>1</sup> ARGUETA is the sole owner of REHII. ARGUETA has also been REHII's chief executive officer, secretary, chief financial officer, and sole director from at least November 3, 2023 through the present. REHII has had the following fictitious business names:

- "College of Real Estate" from on or about February 27, 2015 through the present;
- "Luxe by Real Estate Heaven" from on or about November 2, 2015 through the present;
- "Real Estate Heaven" from on or about November 2, 2015 through the present;
- "Real Estate Heaven Training Center" from on or about November 2, 2015 through the present;
- "REH Property Management" from on or about November 6, 2015 through the present;
- "REH Real Estate" from on or about August 11, 2016 through the present; and
- "The C.O.R.E." from on or about February 27, 2015 through the present.

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<sup>1</sup> From on or about January 9, 2014 to April 7, 2019, REHII's designated officer was Robert Edmundo Silva (license number 00860584).

1 4.

2 a. ARGUETA is presently licensed and/or has license rights under the Real  
3 Estate Law as a real estate broker (license number 01223040). ARGUETA was originally  
4 licensed as a real estate broker on or about August 13, 2010, and has been so licensed since  
5 then. Previously, ARGUETA was licensed as a real estate salesperson from on or about May  
6 30, 1997 to November 30, 1998 and from on or about October 25, 2004 to August 12, 2010.  
7 ARGUETA has had the fictitious business names, "Argueta Enterprises" and "My Home  
8 Group Real Estate," registered with the Department of Real Estate from on or about May 25,  
9 2018 through the present.

10 b. Previously, ARGUETA was the designated officer of Lowell &  
11 Vanderbilt, Inc. (license number 01960259) and Airlume, Inc. (license number 02104794).  
12 ARGUETA was the sole designated officer of Lowell & Vanderbilt, Inc. (license number  
13 01960259) from on or about August 4, 2014 to August 3, 2022. Lowell & Vanderbilt, Inc. was  
14 only licensed from on or about August 4, 2014 to August 3, 2022. ARGUETA was the sole  
15 designated officer of Airlume, Inc. (license number 02104794) from on or about October 21,  
16 2019 to October 20, 2023. Airlume, Inc. was only licensed from on or about October 21, 2019  
17 to October 20, 2023.

18  
19 (REAL ESTATE ACTIVITIES)

20 5.

21 At all times mentioned, in the County of Los Angeles, Respondents REHII and  
22 ARGUETA engaged in the business of a real estate broker conducting licensed activities within  
23 the meaning of Code section 10131(a) ("[s]ells or offers to sell, buys or offers to buy, solicits  
24 prospective sellers or buyers of, solicits or obtains listings of, or negotiates the purchase, sale, or  
25 exchange of real property or a business opportunity") and California Financial Code section  
26 17003 (escrow services).

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(REAL ESTATE TRANSACTIONS)

Sunnycrest Property

6.

On or about August 9, 2022, REHII by its licensed real estate salesperson, Rodolfo Carbajal, entered into a Residential Listing Agreement to represent the seller, Sunnycrest Properties, LLC, in the sale of 4525 Sunnycrest Dr., Los Angeles, CA 90065 ("Sunnycrest Property").

7.

Later that month, the buyer, the P. M. Trust, offered to purchase the Sunnycrest Property for \$2,175,000.00.

8.

Soon thereafter, REHII through Ariel Vasquez, ARGUETA's daughter and REHII's escrow officer who is not licensed with the Department of Real Estate in any capacity, opened a broker-controlled escrow under the unlicensed fictitious business name, "Real Estate Heaven International – Escrow Division," and handled escrow for the sale of the Sunnycrest Property. REHII and ARGUETA failed to notify all parties in the transaction that REHII was a non-independent broker escrow.

9.

On or about September 27, 2022, escrow closed, and \$2,067,096.49 was due to the seller, Sunnycrest Properties, LLC, after all the proper debits were made. (These debits include, but are not limited to, taxes, commissions, title fees, and escrow charges.) However, REHII and ARGUETA disbursed only \$1,650,000.00 to Sunnycrest Properties, LLC, and failed to disburse \$417,096.49 to Sunnycrest Properties, LLC.

10.

To date, REHII and ARGUETA have not paid the total amount due to the seller of the Sunnycrest Property.

1 Arrowhead Lake Property

2 11.

3 In or about April 2023, the sellers of 8900 Arrowhead Lake Rd., Hesperia CA  
4 92345 ("Arrowhead Lake Property") agreed that REHII by its licensed real estate salesperson  
5 Marcelo Monroy, Jr. would be their listing agent. (Marcelo Monroy, Jr. is the sellers' son.)

6 12.

7 On or about April 2023, the buyers, I. C. and J. C., agreed to purchase the  
8 Arrowhead Lake Property for \$525,000.00.

9 13.

10 Soon thereafter, REHII through Ariel Vasquez opened a broker-controlled  
11 escrow under the unlicensed fictitious business name, "Real Estate Heaven International –  
12 Escrow Division," and handled the escrow for the sale of the Arrowhead Lake Property. REHII  
13 and ARGUETA failed to notify all parties in the transaction that REHII was a non-independent  
14 broker escrow.

15 14.

16 On or about May 15, 2023, escrow closed, and \$488,856.50 was due to the  
17 sellers after all the proper debits were made. However, REHII and ARGUETA only disbursed  
18 \$332,847.21 to the sellers of the Arrowhead Lake Property, and failed to disburse \$156,009.29  
19 to the sellers of the Arrowhead Lake Property.

20 15.

21 To date, REHII and ARGUETA have not paid the total amount due to the sellers  
22 of the Arrowhead Lake Property.

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1 Kemp Property

2 16.

3 On or about February 23, 2023, REHII by its licensed real estate salesperson,  
4 Carol Rosanna Silva (license number 01090309) made an offer on behalf of the buyers, M. S.  
5 and R. V., to purchase 1030 S. Kemp Ave., Compton, CA 90220 ("Kemp Property") for  
6 \$535,000.00.

7 17.

8 On or about February 25, 2023, the sellers through their listing agent, Paula  
9 Willhite & Associates Real Estate Team, Inc., a licensed real estate broker, accepted the offer.

10 18.

11 On or about March 3, 2023, REHII through Ariel Vasquez opened a broker-  
12 controlled escrow under the unlicensed fictitious business name, "Real Estate Heaven  
13 International – Escrow Division," and handled the escrow for the sale of the Kemp Property.

14 19.

15 To date, REHII and ARGUETA have failed to disburse the listing agent's  
16 commission to the listing agent for the Kemp Property.

17  
18 Mona Property

19 20.

20 On or about May 2023 or June 2023, the seller, Started from the Bottom, Inc.<sup>2</sup>  
21 and the buyer, R. H., agreed for R. H. to purchase the distressed fire-damaged property known  
22 as 11208 Mona Blvd, Los Angeles, CA 90059 ("Mona Property") for \$101,000.00. (R. H.  
23 believed the structure was still salvageable.) ARGUETA is Started from the Bottom, Inc.'s  
24 chief executive officer ("CEO"), chief financial officer ("CFO"), and director; and Carol  
25 Rosanna Silva (license number 01090309) is its Secretary.

26  
27 <sup>2</sup> Started from the Bottom, Inc. is not now, and has never been, licensed by the Department of  
Real Estate in any capacity.

1 21.

2 On or about June 5, 2023, REHII opened a broker-controlled escrow under the  
3 unlicensed fictitious business name, "Real Estate Heaven International – Escrow Division," and  
4 handled the escrow for the sale of the Mona Property. REHII and ARGUETA failed to notify  
5 all parties in the transaction that REHII was a non-independent broker escrow.

6 22.

7 Soon thereafter, Started from the Bottom, Inc. and ARGUETA notified R. H.  
8 that they were ready to close escrow, so R. H. wired approximately \$101,000 into REHII's  
9 escrow.

10 23.

11 While the Mona Property was in escrow in June 2023 or July 2023, a second fire  
12 further damaged the Mona Property. (R. H. believed that the structure was no longer  
13 salvageable.) Both Started from the Bottom, Inc. and ARGUETA failed to notify R. H. of this  
14 second fire.

15 24.

16 In addition, R. H. discovered Started From The Bottom, Inc. did not have clear  
17 title of the Mona Property. Both Started from the Bottom, Inc. and ARGUETA failed to notify  
18 R. H. of any title issues.

19 25.

20 As a result of the additional damage caused by the second fire, R. H. cancelled  
21 escrow because Started from the Bottom, Inc. could not perform in delivering the Mona  
22 Property in the condition prior to the second fire and with a clear title.

23 26.

24 To date, Started from the Bottom, Inc. and ARGUETA have failed to return R.  
25 H.'s funds despite not delivering the Mona Property in the condition prior to the second fire and  
26 with a clear title.

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27.

The conduct, acts, and/or omissions of Respondents REHII and ARGUETA, as set forth in paragraphs 3 to 27, above, are in violation of Code sections 10159.2 (failure to supervise), 10159.5 (unlicensed fictitious business name), 10176(e) (commingling), 10176(i) (fraud/dishonest dealing), 10177(d) (willful disregard or violation of the Real Estate Law), 10177(g) (negligence and/or incompetence), 10177(h) (failure to supervise), and 10177(j) (fraud and/or dishonest dealing) and Regulations sections 2725 (failure to exercise reasonable supervision over activities of salespersons) and 2731(d) (failure to disclose “non-independent broker escrow”)

(TRUST FUND AUDIT)

28.

On or about October 11, 2024, the Department of Real Estate completed an audit examination of the books and records of REHII to determine whether REHII and ARGUETA handled and accounted for trust funds and conducted their real estate activities in accordance with the Real Estate Law and Regulations. The audit examination covered a period of time beginning on January 1, 2022 and ending on September 30, 2023. The audit examination revealed violations of the Code and the Regulations set forth in the following paragraphs, and more fully discussed in Audit Report LA230030 and the exhibits and work papers attached to said audit report.

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1 Bank Accounts

2 29.

3 At all times mentioned, in connection with the activities described in Paragraph  
4 5, above, Respondents REHII and ARGUETA accepted or received funds including funds in  
5 trust ("trust funds") from or on behalf of actual or prospective parties, such as owners of real  
6 property, and thereafter made deposits and/or disbursements of such funds. From time to time  
7 herein mentioned, during the audit period, said trust funds were deposited and/or maintained  
8 by REHII and ARGUETA in the following bank account:

9 "Real Estate Heaven International, Inc"

10 \*\*\*\*\*8253

11 Bank of America

12 P.O. Box 15284

13 Wilmington, DE 19850

BA 1

14 "REH Group"

15 \*\*\*\*\*3425

16 Bank of America

17 P.O. Box 15284

18 Wilmington, DE 19850

BA 2

19 30.

20 In the course of activities described in Paragraphs 5 and 29, above, and during  
21 the audit examination period in Paragraph 28, above, Respondents REHII and ARGUETA acted  
22 in violation of the Code and the Regulations as set forth below:

23 (a)(1) Permitted, allowed, or caused the disbursement of trust funds from the  
24 trust account BA 1 where the disbursement of funds reduced the total of aggregate funds in BA  
25 1, to an amount which, on January 31, 2023, was a minimum shortage of \$150,277.08 without  
26 first obtaining the prior written consent of the owners of said funds, in violation of Code section  
27 10145 and Regulations sections 2832.1, 2950(g), and 2951.

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- \$149,882.90 of the minimum shortage of \$150,277.08 was due to conversion of funds and/or unauthorized disbursements. \$122,000.00 of the \$149,882.90 was wired to Started from the Bottom, Inc.<sup>3</sup> From on or about March 10, 2022 through the present ARGUETA has been Started from the Bottom, Inc.'s chief executive officer, chief financial officer, sole director, and agent for service of process; and Carol Rosanna Silva (real estate salesperson license number 01090309) has been Started from the Bottom, Inc.'s secretary.<sup>4</sup>
- \$394.18 of the minimum shortage of \$150,277.08 was unidentified due to REHII and ARGUETA failing to provide complete bank records for BA 1. REHII and ARGUETA failed to provide any bank records for BA 1 from February 2023 to September 2023 as well as complete control records (receipts and disbursements), separate records, cancelled checks, deposit receipts/slips, and invoices.

(a)(2) Permitted, allowed, or caused the disbursement of trust funds from the trust account BA 2 where the disbursement of funds reduced the total of aggregate funds in BA 2, to an amount which, on September 30, 2023, was a minimum shortage of \$422,980.22 without first obtaining the prior written consent of the owners of said funds, in violation of Code section 10145 and Regulations sections 2832.1, 2950(g), and 2951.

- \$133,028.22 of the minimum shortage of \$422,980.22 was due to conversion of trust funds. This conversion of funds included \$23,926.11 in credit card payments Ralphs (market), Vallarta Market, Subway (restaurant), ADT Security, etc. as well as for a recurring monthly Microsoft Team subscription. This conversion of funds also included \$58,956.99 in Zelle payments to ARGUETA and other real estate licensees.

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<sup>3</sup> Started from the Bottom, Inc. is not now, and has never been, licensed by the Department of Real Estate in any capacity.

<sup>4</sup> Carol Rosanna Silva's responsible broker has been REHII from on or about September 22, 2020 through the present.

- \$309,519.00 of the minimum shortage of \$422,980.22 was unidentified due to REHII and ARGUETA failing to provide the control record and separate records for BA 2. REHII and ARGUETA failed to provide any bank statements for the 2022 year as well as records for all receipts and disbursements (control records), separate records, cancelled checks, deposit receipt/slips and invoices for the audit examination.

(a)(3) Failed to disburse \$417,096.49 to the seller, Sunnycrest Properties, LLC, for the sale of the Sunnycrest Property, in violation of Code section 10145 and Regulations sections 2832.1, 2950(g), and 2951. On or about September 27, 2022, escrow closed for the sale of the Sunnycrest Property. The Sunnycrest Property was sold for \$2,175,000.00 with \$2,067,096.49 of the sales proceeds due to seller. However, REHII and ARGUETA disbursed only \$1,650,000.00 of the \$2,067,096.49 to the seller. The \$1,650,000.00 was wired from REHII's Bank of America bank account described as "BK AMER NYC . . . 3805." REHII and ARGUETA failed to inform the Department of Real Estate about this Bank of America account during the audit, and failed to provide complete records for this bank account.

(b)(1) Disbursed trust funds belonging to the sellers and buyers without written instructions and/or permission from the sellers and buyers for the sale of the Arrowhead Lake Property, in violation of Code section 10145 and Regulations sections 2832.1, 2950(g), and 2951.

(b)(2) Disbursed trust funds belonging to the sellers and buyers without written instructions and/or permission from the sellers and buyers for the sale of the Sunnycrest Property, in violation of Code section 10145 and Regulations sections 2832.1, 2950(g), and 2951. As of at least September 30, 2023, failed to disburse \$417,096.49 to the seller of the Sunnycrest Property.

(b)(3) Disbursed trust funds belonging to the sellers and buyers without written instructions and/or permission from the sellers and buyers for the sale of the Kemp Property, in violation of Code section 10145 and Regulations sections 2832.1, 2950(g), and 2951.

1 (b)(4) Disbursed trust funds belonging to the sellers and buyers without written  
2 instructions and/or permission from the sellers and buyers for the sale of the Mona Property, in  
3 violation of Code section 10145 and Regulations sections 2832.1, 2950(g), and 2951.

4 (c) Failed to designate BA 2, which held trust funds, as a trust account in the  
5 name of REHII or one of its fictitious business names, in violation of Code section 10145 and  
6 Regulations sections 2832 and 2951. Failed to provide the bank signature card of BA 2, in  
7 violation of Code section 10148.

8 (d) Failed to disburse \$417,096.49 to the seller of the Sunnycrest Property,  
9 \$156,009.29 to the seller of the Arrowhead Lake Property, and \$101,365.37 to the buyer of the  
10 Mona Property, in violation of Code section 10145(a).

11 (e)(1) Disbursed trust funds belonging to the buyers and/or sellers without  
12 written instructions of the party/parties paying the money into the escrow during the audit  
13 period, which resulted in the balances in BA 1 were reduced to amounts less the existing  
14 aggregate trust fund liabilities, in violation of Code sections 10145 and 10176(i) and  
15 Regulations section 2950(g). The examples include, but are not limited to, from November  
16 2022 to January 2023, REHII and ARGUETA made unauthorized disbursements of at least  
17 \$149,882.90 for personal use and business expenses without sufficient funds in BA 1.

18 (e)(2) Disbursed trust funds belonging to the buyers and/or sellers without  
19 written instructions of the party/parties paying the money into the escrow during the audit  
20 period, which resulted in the balances in BA 2 were reduced to amounts less the existing  
21 aggregate trust fund liabilities, in violation of Code sections 10145 and 10176(i) and  
22 Regulations section 2950(g). The examples include, but are not limited to, from July 2023 to  
23 September 2023, REHII and ARGUETA made unauthorized disbursements of at least  
24 \$113,028.22 for personal use and business expenses without sufficient funds in BA 2. These  
25 disbursements included, but are not limited to, PayPal debits/payments, recurring monthly  
26 Microsoft Team subscriptions, and various payments to Ralphs market, Vallarta market,  
27 Subway restaurant, and ADT Security.

1 (f) Failed to disclose in writing to all parties of ARGUETA's financial interest  
2 and ownership of REHII's escrow company with respect to the sales of the Sunnycrest Property,  
3 Arrowhead Lake Property, Kemp Property, and Mona Property, in violation of Regulations  
4 section 2950(h).

5 (g) Failed to timely notify the Department of Real Estate of a change of REHII's  
6 main office address and main office address, in violation of Code section 10162.

7 (h) Used the unlicensed fictitious business names of "REH Group" and "Real  
8 Estate Heavens-Escrow Division" to conduct licensed activities (i.e., broker escrow services), in  
9 violation of Code section 10159.5 and Regulations section 2731.

10 (i) Failed to retain bank signature cards, bank statements, records of receipts and  
11 disbursements, control records, separate records for each beneficiary, records of monthly  
12 reconciliations of trust funds, broker-salesperson relationship agreements, broker escrow logs,  
13 complete broker transaction files related to REHII's broker escrow activities, invoices, credit  
14 reports, appraisal fees, cancelled checks, deposit register and deposit receipts, and other  
15 documents connected to transactions for which a real estate broker license is required for  
16 activity during the period from January 1, 2022 to September 30, 2023, in violation of Code  
17 section 10148.

18 (j) ARGUETA failed to exercise reasonable supervision and control over the  
19 licensed activities of REHII, REHII's licensees, and REHII's employees to ensure full  
20 compliance with the Real Estate Laws and Commissioner's Regulations, and failed to establish  
21 policies, rules, procedures, and systems to review, oversee, and manage transactions, in  
22 violation of Code section 10159.2 and Regulations section 2725.

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31.

The conduct of Respondents REHII and ARGUETA, as described in Paragraph 30, above, violated the Code and the Regulations as set forth below:

<u>PARAGRAPH</u>	<u>PROVISIONS VIOLATED</u>
30(a)	Code section 10145 and Regulations sections 2832.1, 2950(g), and 2951
30(b)	Code section 10145 and Regulations sections 2832.1, 2950(g), and 2951
30(c)	Code section 10145 and Regulations sections 2832 and 2951
30(d)	Code section 10145(a)
30(e)	Code sections 10145 and 10176(i) and Regulations section 2950(g)
30(f)	Regulations section 2950(h)
30(g)	Code section 10162
30(h)	Code section 10159.5 and Regulations section 2731
30(i)	Code section 10148
30(j)	Code section 10159.2 and Regulations section 2725

The foregoing violations constitute cause for discipline of the real estate license and license rights of Respondents REHII and ARGUETA under the provisions of Code sections 10159.2 (failure to supervise), 10176(e) (commingling), 10176(i) (fraud and/or dishonest dealing), 10177(d) (willful disregard or violation of the Real Estate Law), 10177(g) (negligence and/or incompetence), 10177(h) (failure to supervise), and 10177(j) (fraud and/or dishonest dealing).

(COSTS)

32.

Code section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department of Real Estate, 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 investigation and enforcement of the case.

Code section 10148(b) provides, in pertinent part, that the Commissioner shall charge a real estate broker for the cost of any audit, if the Commissioner has found in a final decision following a disciplinary hearing that the broker has violated Code section 10145 or a regulation or rule of the Commissioner interpreting said section.

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 license(s) and/or license rights under the Real Estate Law (Part 1 of Division 4 of the California Business and Professions Code) of Respondents REAL ESTATE HEAVEN INTERNATIONAL, INC. and PAUL RAYMOND ARGUETA, the cost of investigation and enforcement as permitted by law, the cost of audit as permitted by law, and for such other and further relief as may be proper under applicable provisions of law.

Dated at Los Angeles, California: September 8, 2025.

  
Ray Dagnino  
Supervising Special Investigator

cc: Real Estate Heaven International, Inc.  
Paul Raymond Argueta  
Ray Dagnino  
Sacto.