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**FILED**

JUL 29 2026

DEPT. OF REAL ESTATE

By

8 BEFORE THE DEPARTMENT OF REAL ESTATE  
9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation against  
12 PARKER PROPERTY MGMT and  
13 LYSA C. GRESALFI, individually, and as the  
14 designated Broker-Officer for Parker Property Mgmt,  
Respondents.

DRE No. H-43308 LA

ACCUSATION

16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator for the  
17 Department of Real Estate ("Department") of the State of California, for cause of Accusation  
18 against PARKER PROPERTY MGMT and LYSA C. GRESALFI, individually, and as the  
19 designated Broker-Officer for Parker Property Mgmt (collectively "Respondents"), alleges as  
20 follows:

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

23 2. Unless otherwise noted, all references to the "Code" are to the California  
24 Business and Professions Code, all references to the "Real Estate Law" are to Part 1 of Division

1 4 of the Code, and all references to "Regulations" are to the Regulations of the Real Estate  
2 Commissioner, Title 10, Chapter 6, California Code of Regulations.

3 STATUTORY PROVISIONS

4 3. Code section 498 provides:

5 A board may revoke, suspend, or otherwise restrict a license on the ground that the  
6 licensee secured the license by fraud, deceit, or knowing misrepresentation of a material fact or  
7 by knowingly omitting to state a material fact.

8 4. Code section 499 provides:

9 A board may revoke, suspend, or otherwise restrict a license on the ground that the  
10 licensee, in support of another person's application for license, knowingly made a false statement  
11 of a material fact or knowingly omitted to state a material fact to the board regarding the  
12 application.

13 5. Code section 10177 provides, in pertinent part:

14 The commissioner may suspend or revoke the license of a real estate licensee, delay the  
15 renewal of a license of a real estate licensee, or deny the issuance of a license to an applicant,  
16 who has done any of the following, or may suspend or revoke the license of a corporation, delay  
17 the renewal of a license of a corporation, or deny the issuance of a license to a corporation, if an  
18 officer, director, or person owning or controlling 10 percent or more of the corporation's stock  
19 has done any of the following:

20 (a) Procured, or attempted to procure, a real estate license or license  
21 renewal, for themselves or a salesperson, by fraud, misrepresentation, or deceit, or  
22 by making a material misstatement of fact in an application for a real estate  
license, license renewal, or reinstatement.

23 (b)(1) Entered a plea of guilty or no contest to, or been found guilty of, or  
24 been convicted of, a felony, or a crime substantially related to the qualifications,  
functions, or duties of a real estate licensee, and the time for appeal has elapsed or  
the judgment of conviction has been affirmed on appeal, irrespective of an order

1 granting probation following that conviction, suspending the imposition of  
2 sentence, or of a subsequent order under Section 1203.4 of the Penal Code  
3 allowing that licensee to withdraw that licensee's plea of guilty and to enter a plea  
4 of not guilty, or dismissing the accusation or information.

5 (2) Notwithstanding paragraph (1), and with the recognition  
6 that sentencing may not occur for months or years following the entry of a  
7 guilty plea, the commissioner may suspend the license of a real estate  
8 licensee upon the entry by the licensee of a guilty plea to any of the crimes  
9 described in paragraph (1). If the guilty plea is withdrawn, the suspension  
10 shall be rescinded and the license reinstated to its status prior to the  
11 suspension. The department shall notify a person whose license is subject  
12 to suspension pursuant to this paragraph of that person's right to have the  
13 issue of the suspension heard in accordance with Section 10100.

14 (f) Acted or conducted themselves in a manner that would have  
15 warranted the denial of their application for a real estate license, either had a  
16 license denied or had a license issued by another agency of this state, another  
17 state, or the federal government revoked, surrendered, or suspended, or received  
18 an order of debarment, for acts that, if done by a real estate licensee, would be  
19 grounds for the suspension or revocation of a California real estate license, if the  
20 action of denial, revocation, surrender, suspension, or debarment by the other  
21 agency or entity was taken only after giving the licensee or applicant fair notice of  
22 the charges, an opportunity for a hearing, and other due process protections  
23 comparable to the Administrative Procedure Act (Chapter 3.5 (commencing with  
24 Section 11340), Chapter 4 (commencing with Section 11370), and Chapter 5  
(commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the  
Government Code), and only upon an express finding of a violation of law by the  
agency or entity.

(g) Demonstrated negligence or incompetence in performing an act for  
which the officer, director, or person is required to hold a license.

(h) As a broker licensee, failed to exercise reasonable supervision over  
the activities of that licensee's salespersons, or, as the officer designated by a  
corporate broker licensee, failed to exercise reasonable supervision and control of  
the activities of the corporation for which a real estate license is required.

6. **Code section 10211** provides:

If the licensee is a corporation, the license issued to it entitles one officer  
thereof, on behalf of the corporation, to engage in the business of real estate  
broker without the payment of any further fee, such officer to be designated in the  
application of the corporation for a license. For each officer other than the officer  
so designated, through whom it engages in the business of real estate broker, the  
appropriate original or renewal fee is to be paid in addition to the fee paid by the  
corporation.

1           7.     Code section 10159.2 provides:

2           (a)     The officer designated by a corporate broker licensee pursuant to  
3           Section 10211 shall be responsible for the supervision and control of the activities  
4           conducted on behalf of the corporation by its officers and employees as necessary  
5           to secure full compliance with the provisions of this division, including the  
6           supervision of salespersons licensed to the corporation in the performance of acts  
7           for which a real estate license is required.

8           (b)     A corporate broker licensee that has procured additional licenses in  
9           accordance with Section 10158 through officers other than the officer designated  
10          pursuant to Section 10211 may, by appropriate resolution of its board of directors,  
11          assign supervisory responsibility over salespersons licensed to the corporation to  
12          its broker-officers.

13          (c)     A certified copy of any resolution of the board of directors  
14          assigning supervisory responsibility over real estate salespersons licensed to the  
15          corporation shall be filed with the Real Estate Commissioner within five days  
16          after the adoption or modification thereof.

17           8.     Code section 10148 provides:

18          (a)     A licensed real estate broker shall retain for three years copies of  
19          all listings, deposit receipts, canceled checks, trust records, and other documents  
20          executed by the broker or obtained by the broker in connection with any  
21          transactions for which a real estate broker license is required. The retention period  
22          shall run from the date of the closing of the transaction or from the date of the  
23          listing if the transaction is not consummated. After notice, the books, accounts,  
24          and records shall be made available for examination, inspection, and copying by  
25          the commissioner or the commissioner's designated representative during regular  
26          business hours; and shall, upon the appearance of sufficient cause, be subject to  
27          audit without further notice, except that the audit shall not be harassing in nature.  
28          This subdivision shall not be construed to require a licensed real estate broker to  
29          retain electronic messages of an ephemeral nature, as described in subdivision (d)  
30          of Section 1624 of the Civil Code.

31          (b)     The commissioner shall charge a real estate broker for the cost of  
32          any audit, if the commissioner has found, in a final desist and refrain order issued  
33          under Section 10086 or in a final decision following a disciplinary hearing held in  
34          accordance with Chapter 5 (commencing with Section 11500) of Part 1 of  
35          Division 3 of Title 2 of the Government Code that the broker has violated Section  
36          10145 or a regulation or rule of the commissioner interpreting Section 10145.

37          (c)     If a broker fails to pay for the cost of an audit as described in  
38          subdivision (b) within 60 days of mailing a notice of billing, the commissioner  
39          may suspend or revoke the broker's license or deny renewal of the broker's

1 license. The suspension or denial shall remain in effect until the cost is paid or  
2 until the broker's right to renew a license has expired.

3 (d) The commissioner may maintain an action for the recovery of the  
4 cost of an audit in any court of competent jurisdiction. In determining the cost  
5 incurred by the commissioner for an audit, the commissioner may use the  
6 estimated average hourly cost for all persons performing audits of real estate  
7 brokers.

8 (e) The department may suspend or revoke the license of any real  
9 estate broker, real estate salesperson, or corporation licensed as a real estate  
10 broker, if the real estate broker, real estate salesperson, or any director, officer,  
11 employee, or agent of the corporation licensed as a real estate broker knowingly  
12 destroys, alters, conceals, mutilates, or falsifies any of the books, papers, writings,  
13 documents, or tangible objects that are required to be maintained by this section  
14 or that have been sought in connection with an investigation, audit, or  
15 examination of a real estate licensee by the commissioner.

## 16 STATEMENT OF FACTS

### 17 Licenses

18 9. Respondents are presently licensed and/or have license rights under the Real  
19 Estate Law (Part 1 of Division 4 of the Code).

20 10. On October 25, 2024, the Department issued a real estate corporation license to  
21 PARKER PROPERTY MGMT ("PPM"), License ID 02247358.

22 11. On July 20, 2010, the Department issued a real estate broker license to LYSA C.  
23 GRESALFI ("GRESALFI"), License ID 01705185.

24 12. GRESALFI is also the Licensed Officer for PPM pursuant to Codes sections  
10159.2 and 10211.

13. GRESALFI is currently licensed as the designated Officer for approximately  
eleven (11) separate real estate corporations in California.

14. On August 22, 2007, the Department issued a real estate broker license to Gia  
Monique Chavira-Lyons ("Chavira-Lyons"), a.k.a. Gia Lyons and Annette Marie Aricero,  
License ID 01427131.

1           15.     Chavira-Lyons was formerly licensed as a real estate salesperson from  
2 approximately May 21, 2004, through August 21, 2007.

3 Prior Disciplinary Action H-42793 LA

4           16.     On February 9, 2024, the Department filed an Accusation against Chavira-Lyons  
5 in Department Case No. H-42793 LA. The Accusation was served to Chavira-Lyons at Chavira-  
6 Lyons' last known mailing address on February 9, 2024.

7           17.     The Accusation in Department Case No. H-42793 LA alleged that on March 25,  
8 2022, before the Superior Court of California, County of Riverside, in Case No. INF2000740,  
9 Chavira-Lyons was convicted of violating California Penal Code section 273.5(a) (infliction of  
10 corporal injury to spouse) and Penal Code section 245(a)(1) (assault with a non-firearm deadly  
11 weapon likely to produce great bodily injury), both misdemeanors. The Accusation also alleged  
12 that said crime is substantially related to the qualifications, functions, or duties of a licensee of  
13 the Department.

14           18.     Moreover, the Accusation in Department Case No. H-42793 LA alleged that  
15 Chavira-Lyons' conviction on March 25, 2022, and Chavira-Lyons' failure to timely report the  
16 March 25, 2022, conviction to the Department, constituted cause for discipline of Chavira-  
17 Lyons' real estate broker license pursuant to Code sections 490, 10177, subdivision (b), and  
18 10186.2.

19           19.     Chavira-Lyons failed to submit a Notice of Defense in response to the Accusation  
20 in Case No. H-42793 LA. Chavira-Lyons's default was entered on April 23, 2024.

21           20.     On May 7, 2024, the Real Estate Commissioner issued a Decision in Department  
22 Case No. H-42793 LA which revoked Chavira-Lyons' real estate broker license effective on  
23 June 3, 2024.

24     ///

1 Real Estate Corporation License Application for PPM

2 21. On or about June 25, 2024, Chavira-Lyons submitted Articles of Incorporation for  
3 PPM with the Office of the Secretary of State for the State of California. The Directors for PPM  
4 are listed as Chavira-Lyons and Parker Jacob Lyons.

5 22. On or about July 9, 2024, Chavira-Lyons submitted a Fictitious Business Name  
6 Statement with the office of the Assessor-County Clerk-Recorder for the County of Riverside to  
7 register the following fictitious business names: "Parker Property Mgmt" and "A+ Desert Home  
8 Services." Chavira-Lyons' title is listed as Vice-President on the form.

9 23. On July 16, 2024, GRESALFI submitted a Corporation License Application for  
10 PPM to the Department. GRESALFI is listed as the broker-officer for PPM on the application.

11 24. Section III-Regulation 2746 of the Corporation License Application requires the  
12 designated officer to file a background statement of information for each director, chief  
13 executive officer, the president, first level vice-presidents, secretary, chief financial officer,  
14 subordinate officers, and all natural persons owning or controlling more than ten percent of the  
15 corporation's shares if any of the above had 1) a license to engage in or practice real estate or  
16 other regulated profession, occupation or vocation denied, suspended, or revoked during the  
17 preceding 10 years; or 2) been convicted of a crime which is substantially related to the  
18 qualifications, functions, or duties of a licensee of the Department.

19 25. In the July 16, 2024, Corporation License Application for PPM, GRESALFI  
20 certified that a Corporation Background Statement was not needed for any officers or persons  
21 owning or controlling more than ten percent of the corporation shares. Respondents GRESALFI  
22 and PPM failed to disclose Chavira-Lyons' prior conviction and the revocation of Chavira-  
23 Lyons' real estate broker license on PPM's Corporation License Application.

24

1           26.     On October 25, 2024, the Department issued a real estate corporation license to  
2 PPM.

3           27.     On September 2, 2025, a Statement of Information for PPM was filed with the  
4 California Secretary of State. Chavira-Lyons is listed as a Director, the Chief Financial Officer,  
5 Secretary, and Agent for Service of Process for PPM. Parker Jacob Lyons is listed as a Director  
6 and the Chief Executive Officer for PPM. The principal and mailing addresses for PPM listed on  
7 the Statement of Information are : 73216 Cabazon Peak Dr., Palm Desert, California 92260.  
8 Respondent PPM has a different mailing address and main office address listed with the  
9 Department.

10 DRE Investigation

11           28.     On or about September 8, 2025, the Department received an anonymous  
12 complaint against Chavira-Lyons. The complaint alleged that Chavira-Lyons was engaging in  
13 activities that required a real estate license. The Department initiated an investigation.

14           29.     On or about September 10, 2025, the Department sent correspondence to  
15 GRESALFI which requested information regarding the failure to disclose Chavira-Lyons' prior  
16 real estate license revocation on the Corporation License Application for PPM.

17           30.     The Department also served a subpoena for records to PPM and GRESALFI.

18           31.     Respondents PPM and GRESALFI failed to provide any of the records requested  
19 by the Department for the Department's investigation. Respondents failed to retain or provide  
20 records related to PPM's and Chavira-Lyons' real estate activities requiring a real estate broker  
21 license during the past three years.

22           32.     The Department intends to issue a related Preliminary Bar Order and Notice of  
23 Intent to Issue a Bar Order against Chavira-Lyons.

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1           37.     Respondent GRESALFI's failure to disclose Chavira-Lyons' prior criminal  
2 conviction and the revocation of Chavira-Lyons' real estate broker license on June 3, 2024, as  
3 described above in Paragraphs 16 through 20, on PPM's July 16, 2024, Corporation License  
4 Application constitutes the procurement of a real estate license by fraud, deceit, making a  
5 material misstatement, or omission of a material fact, in said application which constitutes cause  
6 for the suspension or revocation of all licenses and license rights of Respondent GRESALFI  
7 pursuant to Code sections 498, 499, and 10177, subdivisions (a), (h), and/or (g).

8                               Third Cause of Accusation (PPM and GRESALFI)

9                                       Retention and Production of Records

10           38.     There is hereby incorporated in this Third, separate and distinct Cause of  
11 Accusation, all of the allegations contained in Paragraphs 1 through 37, with the same force and  
12 effect as if herein fully set forth.

13           39.     Respondents PPM and GRESALFI failed to retain or provide records related to  
14 PPM's and Chavira-Lyons' real estate activities requiring a real estate broker license during the  
15 past three years, in violation of Code section 10148, which constitutes cause for the suspension  
16 or revocation of the real estate licenses and license rights of Respondents PPM and GRESALFI  
17 under the provisions of Code section 10177, subdivisions (d), (h), and/or (g).

18                               Investigation/Enforcement Costs

19           40.     Code section 10106 provides, in pertinent part, that in any order issued in  
20 resolution of a disciplinary proceeding before the Department of Real Estate, the Commissioner  
21 may request the administrative law judge to direct a licensee found to have committed a  
22 violation of this part to pay a sum not to exceed the reasonable costs of the investigation and  
23 enforcement of the case.  
24

1       WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this  
2 Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action  
3 against all licenses and/or license rights of Respondents under the Real Estate Law (Part 1 of  
4 Division 4 of the Business and Professions Code), for the costs of the investigation and  
5 enforcement as permitted by law, and for such other and further relief as may be proper under  
6 other provisions of law.

7       Dated Jul 28, 2026 at San Diego, California.

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9   
10 VERONICA KILPATRICK  
11 Supervising Special Investigator

12 cc: Parker Property Mgmt  
13 Lysa C. Gresalfi  
14 Veronica Kilpatrick  
15 Sacto.  
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