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FILED

SEP 14 2023

DEPT. OF REAL ESTATE

By- [Redacted Signature]

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

11 * * *

12 In the Matter of the Accusation of) No. H-05736 SD
13)
14 RESOURCE1 RESIDENTIAL, INC.,) ACCUSATION
15 BOBBY MICHAEL ISRAEL,)
16 individually and as designated officer of)
17 ReSource1 Residential, Inc.,)
18 LEV CHAIM MIZAN,)
19 individually and as former designated)
20 officer of ReSource1 Residential, Inc., and)
DANIEL CHARLES ZANONI,)
individually and as former designated)
officer of ReSource1 Residential, Inc.,)
Respondents.)

21 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
22 State of California, for cause of Accusation against RESOURCE1 RESIDENTIAL, INC.,
23 BOBBY MICHAEL ISRAEL, individually and as designated officer of ReSource1
24 Residential, Inc., LEV CHAIM MIZAN, individually and as former designated officer of
25 ReSource1 Residential, Inc., and DANIEL CHARLES ZANONI, individually and as former
26 designated officer of ReSource1 Residential, Inc. ("Respondents"), is informed and alleges as
27 follows:

Accusation of RESOURCE1 RESIDENTIAL, INC., BOBBY MICHAEL ISRAEL,
LEV CHAIM MIZAN, and DANIEL CHARLES ZANONI

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1.

The Complainant, Veronica Kilpatrick, acting in his official capacity as a Supervising Special Investigator of the State of California, makes this Accusation against Respondents RESOURCE1 RESIDENTIAL, INC., BOBBY MICHAEL ISRAEL, LEV CHAIM MIZAN, and DANIEL CHARLES ZANONI.

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.

LICENSE HISTORY

3.

Respondent RESOURCE1 RESIDENTIAL, INC. (“RESOURCE1”) presently has license rights under the Real Estate Law, Part 1 of Division 4 of the Code as a corporate real estate broker.

4.

Respondent BOBBY MICHAEL ISRAEL (“ISRAEL”) presently has license rights as a real estate broker. From August 15, 2005, to June 28, 2022, ISRAEL had license rights as a real estate salesperson.

5.

From about August 12, 2022, to the present, Respondent RESOURCE1 is licensed by the Department of Real Estate (“Department”) as a corporate real estate broker by and through Respondent ISRAEL, as the designated officer and broker responsible, pursuant to Code section 10159.2, for supervising the activities requiring a real estate license conducted on behalf of RESOURCE1, or by RESOURCE1’S officers, agents and employees.

6.

Respondent LEV CHAIM MIZAN (“MIZAN”) presently has license rights as a real estate broker.

1 7.

2 From about November 15, 2021, to about August 12, 2022, Respondent
3 RESOURCE1 is licensed by the Department as a corporate real estate broker by and through
4 Respondent MIZAN, as the designated officer and broker responsible, pursuant to Code
5 section 10159.2, for supervising the activities requiring a real estate license conducted on
6 behalf of RESOURCE1, or by RESOURCE1'S officers, agents and employees.

7 8.

8 Respondent DANIEL CHARLES ZANONI ("ZANONI") presently has license
9 rights as a real estate broker.

10 9.

11 From about September 5, 2019, to about November 15, 2021, Respondent
12 RESOURCE1 is licensed by the Department as a corporate real estate broker by and through
13 Respondent ZANONI, as the designated officer and broker responsible, pursuant to Code
14 section 10159.2, for supervising the activities requiring a real estate license conducted on
15 behalf of RESOURCE1, or by RESOURCE1'S officers, agents and employees.

16 10.

17 From about May 8, 2019, to about June 28, 2022, Respondent ISRAEL was
18 licensed and affiliated as a real estate salesperson with responsible broker Legacy Commercial
19 Management Co. From about June 30, 2022, to about September 2, 2022, Respondent ISRAEL
20 was licensed and affiliated as a real estate broker associate with responsible broker Legacy
21 Commercial Management Co.

22 **BROKERAGE**

23 11.

24 At all times mentioned, in the City of San Diego, County of San Diego,
25 Respondent RESOURCE1 acted as a real estate broker, conducting licensed activities within
26 the meaning of Code section 10131(b) (leases or rents real property for others).

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Accusation of RESOURCE1 RESIDENTIAL, INC., BOBBY MICHAEL ISRAEL,
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12.

Respondent RESOURCE1 never entered into a broker-salesperson agreement with Respondent ISRAEL.

LEASE OF LA JOLLA PROPERTY

13.

On or about June 17, 2019, property owner J. Gee entered into a Property Management Agreement with broker Respondent ZANONI to lease real property at 3336 Caminito Eastbluff #154, La Jolla, CA 92037 (“La Jolla property”).

14.

On or about February 27, 2022, property owner J. Gee entered into a Residential Lease or Month-to-Month Rental Agreement with tenants J. Ryan, A. Du, and W. Abdou to lease the La Jolla property (“La Jolla property lease”). Respondent ISRAEL prepared the La Jolla property lease for Respondent RESOURCE1. The La Jolla property lease, under section 3.D., provided for rent to be made payable to RESOURCE1 and to be delivered to ISRAEL. The La Jolla property lease, under section 41.A., provided that the tenant’s broker was Legacy Commercial Management, and ISRAEL signed section 41.A. for Legacy Commercial Management Co.

15.

On or about March 1, 2022, property owner J. Gee and tenants J. Ryan, A. Du, and W. Abdou signed a Lead-Based Paint and Lead-Based Paint Hazards Disclosure, Acknowledgement and Addendum for the La Jolla property. Respondent ISRAEL prepared the Lead-Based Paint and Lead-Based Paint Hazards Disclosure, Acknowledgement and Addendum for Respondent RESOURCE1. ISRAEL signed the Lead-Based Paint and Lead-Based Paint Hazards Disclosure, Acknowledgement and Addendum for Legacy Commercial Management Co.

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16.

Legacy Commercial Management Co had no knowledge of the La Jolla property lease, and did not authorize Respondent ISRAEL to sign documents regarding the La Jolla property lease on behalf of Legacy Commercial Management Co.

LEASE OF CAMINITO PASADERO PROPERTY

17.

On or about August 11, 2020, property owner V. Pantaleeva entered into a Property Management Agreement with broker Respondent RESOURCE1 to lease real property at 18543 Caminito Pasadero Unit 371, San Diego, CA 92128 (“Caminito Pasadero property”).

18.

On or about February 10, 2021, property owner V. Pantaleeva entered into a Residential Lease or Month-to-Month Rental Agreement with tenant J. Marshall to lease the Caminito Pasadero property (“Caminito Pasadero property lease”).

19.

On or about December 9, 2021, Respondent RESOURCE1 and Respondent ISRAEL wrote an email to property owner V. Pantaleeva, which said in part, “Your property will now be managed directly by our President, Bobby Israel”.

LEASE OF LAKERIM PROPERTY

20.

On or about June 30, 2021, property owner L. Gander entered into a Property Management Agreement with broker Respondent RESOURCE1 to lease real property at 11325 Lakerim Rd, San Diego, CA 92131 (“Lakerim property”).

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24.

On or about December 23, 2021, Infinity Property Group, LLC into a Residential Lease or Month-to-Month Rental Agreement with tenants S. Weaver and M. Redburn to lease the Chula Vista property (“Chula Vista property lease”). Respondent ISRAEL prepared the Chula Vista property lease for Respondent RESOURCE1. The Chula Vista property lease, under section 3.D., provided for rent to be made payable to RESOURCE1. The Chula Vista property lease, under section 49.A., provided that the property management firm was RESOURCE1 and the agent was ISRAEL with license number 01703106.

DEPARTMENT OF REAL ESTATE INVESTIGATION

25.

On or about August 8, 2022, a Department investigator wrote an email to Respondent ISRAEL requesting information regarding the property management activities of Respondent RESOURCE1 and ISRAEL.

26.

On or about August 8, 2022, Respondent ISRAEL wrote a letter to the Department, which said in part, “From September 5, 2019 [sic] through November 15, 2021, Mr. Zanoni oversaw all Resource1 Residential, Inc. operations, including, but not limited to, business development leasing, maintenance calls, marketing and tenant/owner communications. Subsequent to November 15, 2021, Mr. Mizan took over the aforementioned duties. I provided support to the Designated Broker of Record.”

27.

On or about September 8, 2022, a Department investigator interviewed Respondent MIZAN. MIZAN stated in part that Respondent ISRAEL drafted all the leases for tenants and management agreements for owners.

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1 FIRST CAUSE OF ACTION

2 SUBSTANTIAL MISREPRESENTATION, FRAUD AND DISHONEST DEALING

3 28.

4 The conduct, acts, and omissions of Respondent ISRAEL, as described in
5 Paragraphs 3 through 27 above, are in violation of Code sections 10176(a), 10176(i), and/or
6 10177(j) and constitute cause under Code sections 10176(a), 10176(i), and/or 10177(j) for the
7 suspension or revocation of all the licenses, license endorsements, and license rights of
8 ISRAEL.

9 SECOND CAUSE OF ACTION

10 EMPLOYMENT OF SALESPERSON BY BROKER OTHER THAN BROKER OF RECORD

11 29.

12 The conduct, acts, and omissions of Respondents RESOURCE1 and ISRAEL,
13 as described in Paragraphs 3 through 27 above, are in violation of Code sections 10130 and/or
14 10137 and constitute cause under Code sections 10137, 10177(d), and/or 10177(g) for the
15 suspension or revocation of all the licenses, license endorsements, and license rights of
16 RESOURCE1 and ISRAEL.

17 THIRD CAUSE OF ACTION

18 FAILURE TO HAVE A RELATIONSHIP AGREEMENT

19 30.

20 The conduct, acts, and omissions of Respondent RESOURCE1, as described in
21 Paragraphs 3 through 27 above, are in violation of Regulations section 2726 and constitute
22 cause under Code sections 10177(d) and/or 10177(g) for the suspension or revocation of all the
23 licenses, license endorsements, and license rights of RESOURCE1.

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27 Accusation of RESOURCE1 RESIDENTIAL, INC., BOBBY MICHAEL ISRAEL,
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1 FOURTH CAUSE OF ACTION

2 FAILURE TO SUPERVISE

3 31.

4 The conduct, acts, or omissions of Respondents MIZAN and ZANONI, as
5 described in Paragraphs 3 through 27 above, in failing to ensure compliance of the Real Estate
6 Law by Respondents RESOURCE1 and ISRAEL, are in violation of Code section 10159.2 and
7 Regulations section 2725 and constitute cause under Code sections 10177(d), 10177(g),
8 and/or 10177(h) for the suspension or revocation of all the licenses and license rights of
9 MIZAN and ZANONI.

10 32.


11 Code section 10106 provides, in pertinent part, that in any order issued in
12 resolution of a disciplinary proceeding before the Department of Real Estate, the Commissioner
13 may request the administrative law judge to direct a licensee found to have committed a
14 violation of this part to pay a sum not to exceed the reasonable costs of the investigation and
15 enforcement of the case.

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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 the licenses, license endorsements, and license rights of Respondents RESOURCE1 RESIDENTIAL, INC., BOBBY MICHAEL ISRAEL, LEV CHAIM MIZAN, and DANIEL CHARLES ZANONI under the Real Estate Law, for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at San Diego, California
this 8th day of September, 2023


Veronica Kilpatrick
Supervising Special Investigator

cc: RESOURCE1 RESIDENTIAL, INC.
BOBBY MICHAEL ISRAEL
LEV CHAIM MIZAN
DANIEL CHARLES ZANONI
Veronica Kilpatrick
Sacto.