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FILED

JUN 29 2020

DEPT. OF REAL ESTATE

By *John Aguirre*

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

11 * * *

12 In the Matter of the Accusation of) No. H-41678 LA
13)
14) **CYRUS AHMADI,**) **ACCUSATION**
15) **Respondent.**)
16)

17 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
18 of California, for cause of Accusation against CYRUS AHMADI ("Respondent") alleges as
19 follows:

20 1.

21 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
22 of California, makes this Accusation in her official capacity.

23 2.

24 Respondent presently has license rights under the Real Estate Law, Part 1 of
25 Division 4 of the California Business and Professions Code ("Code"), as a real estate broker
26 (License ID 01098856). Respondent's license is set to expire on March 27, 2023 unless
27 renewed.

///

1 (CRIMINAL CONVICTIONS)

2 3.

3 On or about September 17, 2018, in the Superior Court of California, County of
4 Los Angeles, Case No. 8VW04184, Respondent was convicted on a plea of no contest for
5 violations of Penal Code sections 242-243(e)(1) (domestic battery), a misdemeanor. The court
6 suspended the imposition of sentence and placed Respondent on 36 months of summary
7 probation under certain terms and conditions, including 10 days of community labor, 52 weeks
8 of domestic violence treatment program, 26 weeks of parenting skills program, and payment of
9 restitution, fines and fees.

10 4.

11 On or about February 25, 2019, in the Superior Court of California, County of
12 Los Angeles, Case No. 8VW06455, Respondent was convicted on a plea of no contest for
13 violations of Penal Code sections 273.5(a) (corporal injury on spouse) and 166(c)(1) (violating
14 a court order), both misdemeanors. The court suspended the imposition of sentence and placed
15 Respondent on 36 months of summary probation under certain terms and conditions, including
16 60 days in county jail, 45 days of community labor, 52 weeks of domestic violence treatment
17 program, and payment of restitution, fines and fees.

18 5.

19 The convictions, as described in Paragraphs 3 and 4 above, bear a substantial
20 relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the
21 qualifications, functions or duties of a real estate licensee.

22 6.

23 The crimes for which Respondent was convicted, as described in Paragraphs 3
24 and 4 above, constitute cause under Code sections 490 and 10177(b) for the suspension or
25 revocation of the license and license rights of Respondent under the Real Estate Law.

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1 (COSTS OF INVESTIGATION AND ENFORCEMENT)

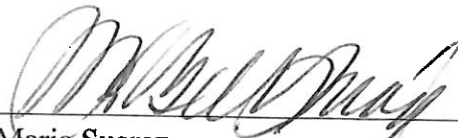
2 7.

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

8 WHEREFORE, Complainant prays that a hearing be conducted on the
9 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
10 disciplinary action against all the licenses and license rights of CYRUS AHMADI under the
11 Real Estate Law, for the costs of investigation and enforcement as permitted by law, and for
12 such other and further relief as may be proper under other applicable provisions of law.

13
14 Dated at Los Angeles, California

15 this 21ST day of May, 2020.

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17
18 
19 Maria Suarez
20 Supervising Special Investigator

21
22 cc: CYRUS AHMADI
23 Building Capital Inc.
24 Maria Suarez
25 Sacto.
26
27

Flag

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FILED

JUL 15 2020

DEPT. OF REAL ESTATE

By John Aziz

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

| | | |
|------------------------------------|---|----------------------|
| In the Matter of the Accusation of |) | No. H-41678 LA |
| |) | |
| CYRUS AHMADI, |) | <u>FIRST AMENDED</u> |
| |) | <u>ACCUSATION</u> |
| Respondent. |) | |
| |) | |

This Accusation amends the Accusation filed on June 29, 2020. The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California, for cause of Accusation against CYRUS AHMADI ("Respondent") alleges as follows:

1.

The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California, makes this Accusation in her official capacity.

2.

Respondent presently has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code ("Code"), as a real estate broker (License ID 01098856). Respondent's license is set to expire on March 27, 2023 unless renewed. Respondent also holds an individual Mortgage Loan Originator license endorsement, National Mortgage Licensing System and Registry ("NMLS") No. 287545, as of February 2,

ACCUSATION

1 2011. Respondent's MLO license endorsement is set to expire on December 31, 2020, unless
2 renewed.

3 (CRIMINAL CONVICTIONS)

4 3.

5 On or about September 17, 2018, in the Superior Court of California, County of
6 Los Angeles, Case No. 8VW04184, Respondent was convicted on a plea of no contest for
7 violations of Penal Code sections 242-243(e)(1) (domestic battery), a misdemeanor. The court
8 suspended the imposition of sentence and placed Respondent on 36 months of summary
9 probation under certain terms and conditions, including 10 days of community labor, 52 weeks
10 of domestic violence treatment program, 26 weeks of parenting skills program, and payment of
11 restitution, fines and fees.

12 4.

13 On or about February 25, 2019, in the Superior Court of California, County of
14 Los Angeles, Case No. 8VW06455, Respondent was convicted on a plea of no contest for
15 violations of Penal Code sections 273.5(a) (corporal injury on spouse) and 166(c)(1) (violating
16 a court order), both misdemeanors. The court suspended the imposition of sentence and placed
17 Respondent on 36 months of summary probation under certain terms and conditions, including
18 60 days in county jail, 45 days of community labor, 52 weeks of domestic violence treatment
19 program, and payment of restitution, fines and fees.

20 5.

21 The convictions, as described in Paragraphs 3 and 4 above, bear a substantial
22 relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the
23 qualifications, functions or duties of a real estate licensee.

24 6.

25 The crimes for which Respondent was convicted, as described in Paragraphs 3
26 and 4 above, constitute cause under Code sections 490 and 10177(b) for the suspension or
27 revocation of the license and license rights of Respondent under the Real Estate Law.

(COSTS OF INVESTIGATION AND ENFORCEMENT)


7.

California Business and Professions 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 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 the licenses and license rights of CYRUS AHMADI under the Real Estate Law, for the costs 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 Los Angeles, California

this 14th day of July, 2020.


Maria Suarez
Supervising Special Investigator

cc: CYRUS AHMADI
Building Capital Inc.
Maria Suarez
Sacto.