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KYLE T. JONES, Counsel (SBN 300751) Bureau of Real Estate FILED P.O. BOX 137007 3 Sacramento, CA 95813-7007 FEB 1 4 2018 4 Telephone: (916) 263-8672 **BUREAU OF REAL ESTATE** (916) 263-3767 (Fax) 5 (916) 263-7303 (Direct) 6 7 8 BEFORE THE BUREAU OF REAL ESTATE 9 STATE OF CALIFORNIA 10 11 In the Matter of the Accusation of 12 NO. H-3127 FR TONY ISSAC ALAHVERDI, 13 FIRST AMENDED Respondent. **ACCUSATION** 14 15 The Complainant, BRENDA SMITH, acting in her official capacity as a 16 Supervising Special Investigator of the State of California, for this Accusation against TONY ISSAC ALAHVERDI ("Respondent"), is informed and alleges as follows: 17 18 19 Respondent is presently licensed and/or has license rights under the Real Estate 20 Law, Part 1 of Division 4 of the Business and Professions Code ("the Code"), as a real estate 21 broker. 22 CRIMINAL CONVICTION 23 2 24 On or about April 12, 2017, in the Superior Court of the State of California, County of Tuolumne, Case No. CRF52344, Respondent was convicted of violating Section 25 245(a)(1) of the California Penal Code (assault with a deadly weapon), a misdemeanor and a 26 27 ///

crime that bears a substantial relationship to the qualifications, functions or duties of a real estate 1 2 licensee pursuant to Section 2910, Title 10, of the California Code of Regulations. 3 **GROUNDS FOR DISCIPLINE** 3 5 The facts alleged in Paragraph 2, above, constitute cause under Sections 490 6 (conviction of substantially related crime) and 10177(b) (conviction of substantially related 7 crime) of the Code for the suspension or revocation of all licenses and license rights of 8 Respondent under the Real Estate Law. 9 MATTER IN AGGRAVATION 10 11 On or about December 6, 1999, in the Superior Court of the State of California, 12 County of Stanislaus, Case No. 199757, Respondent was convicted of violating Section 13 245(a)(1) of the California Penal Code, a misdemeanor. 14 COST RECOVERY 15 5 16 The Bureau will seek to recover cost of the investigation and prosecution of this 17 case pursuant to section 10106 of the Code which provides, in pertinent part, that in any order 18 issued in resolution of a disciplinary proceeding before the Bureau, the Commissioner may 19 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 20 21 the case. 22 WHEREFORE, Complainant prays that a hearing be conducted on the allegations 23 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all licenses and license rights of Respondent under the Real Estate Law, for the 24 25 /// 26 27

cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other provisions of law. BRENDA SMITH Supervising Special Investigator Dated at Fresno, California, this 13 day of February 2017. **DISCOVERY DEMAND** Pursuant to Sections 11507.6, et seq. of the Administrative Procedure Act, the Department hereby makes demand for discovery pursuant to the guidelines set forth in the Administrative Procedure Act. Failure to provide Discovery to the Department may result in the exclusion of witnesses and documents at the hearing or other sanctions that the Office of Administrative Hearings deems appropriate.