1	KYLE T. JONES, Counsel (SBN 300751)
2	P.O. BOX 137007 FILED
3	Sacramento, CA 95813-7007
4	Telephone: (916) 263-8672 NOV 2 8 2018
5	(916) 263-3767 (Fax) DEPARTMENT OF REAL ESTATE
6	(916) 263-7303 (Direct) By K. Knopp
7	
8	BEFORE THE DEPARTMENT OF REAL ESTATE
9	STATE OF CALIFORNIA
10	* * *
11	In the Matter of the Application of )
12	) NO. H-3214 FR MARINA NAZARIREIHANABAD, )
13	) <u>STATEMENT OF ISSUES</u>
14	Respondent. )
15	The Complainant, BRENDA SMITH, acting in her official capacity as a
16	Supervising Special Investigator of the State of California, for this Statement of Issues against
17	MARINA NAZARIREIHANABAD ("Respondent"), is informed and alleges as follows:
18	1
19	On or about March 15, 2018, Respondent made application to the Department of
20	Real Estate of the State of California for a real estate salesperson license.
21	2
22	On or about August 16, 2017, in the Superior Court of the State of California,
23	County of Stanislaus, Case No. 1488436-E, Respondent was convicted of violating Section
24	20002(a) (hit and run) of the California Vehicle Code, a misdemeanor and a crime that bears a
25	substantial relationship to the qualifications, functions or duties of a real estate licensee pursuant
26	to Section 2910, Title 10, of the California Code of Regulations.
27	///

## 1 **GROUNDS FOR DENIAL** 2 3 3 Respondent's criminal conviction described above in Paragraph 2 constitutes cause for denial of Respondent's application for a real estate salesperson license pursuant to the 4 provisions of Sections 480(a)(1) (conviction of crime), 480(a)(2) (act involving dishonesty, 5 fraud, or deceit), 10177(b) (conviction of crime), and 10177(j) (engaged in conduct that 6 constitutes fraud or dishonest dealing) of the Business and Professions Code. 7 WHEREFORE, the Complainant prays that the above-entitled matter be set for 8 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to 9 10 authorize the issuance of, and deny the issuance of, a real estate salesperson/broker license to 11 Respondent, and for such other and further relief as may be proper under applicable provisions of 12 law. 13 14 BRENDA SMITH 15 Supervising Special Investigator 16 17 Dated at Fresno, California, 18 this 20 day of Abvember, 2018. 19 20 DISCOVERY DEMAND 21 Pursuant to Sections 11507.6, et seq. of the Administrative Procedure Act, the 22 23 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 24 exclusion of witnesses and documents at the hearing or other sanctions that the Office of 25 26 Administrative Hearings deems appropriate. 27

2