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FILED

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DEPARTMENT OF REAL ESTATE
By B. N. C. W. L. E. R.

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

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11 In the Matter of the Accusation of)
12) No. H-3526 FR
13 IBRAHIM MAHER GARAS,)
14 Respondent.) ACCUSATION

15 The Complainant, RUBEN CORONADO, acting in his official capacity as a
16 Supervising Special Investigator of the State of California, for this Accusation against IBRAHIM
17 MAHER GARAS ("Respondent"), is informed and alleges as follows:

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19 Respondent is presently licensed and/or has license rights under the Real Estate
20 Law, Part 1 of Division 4 of the California Business and Professions Code ("Code"), as a real
21 estate salesperson.

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23 On or about January 19, 2022, in the Superior Court of the State of California,
24 County of Kern, Case No. BF181901A, Respondent was convicted of violating Section 4060
25 (possession of a controlled substance) of the California Business and Professions Code, a
26 misdemeanor and a crime that bears a substantial relationship to the qualifications, functions or

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duties of a real estate licensee pursuant to Section 2910, Title 10, Chapter 6, of the California Code of Regulations.

GRUNDS FOR DISCIPLINE

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The facts alleged in Paragraph 2, above, constitute cause under Sections 490 (conviction of substantially related crime) and 10177(b) (conviction of substantially related crime) of the Code for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

COST RECOVERY

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The Department will seek to recover the costs of the investigation and prosecution of this case pursuant to Section 10106 of the Code which provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, 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 licenses and license rights of Respondent under the Real Estate Law, for the

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1 cost of investigation and enforcement as permitted by law, and for such other and further relief
2 as may be proper under other provisions of law.

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5 RUBEN CORONADO
6 Supervising Special Investigator

7 Dated at Fresno, California,
8 this 15th day of November 2023.

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10 DISCOVERY DEMAND

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12 Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the
13 Department hereby makes demand for discovery pursuant to the guidelines set forth in the
14 *Administrative Procedure Act*. Failure to provide Discovery to the Department may result in the
15 exclusion of witnesses and documents at the hearing or other sanctions that the Office of
16 Administrative Hearings deems appropriate.