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FILED

APR 26 2017

BUREAU OF REAL ESTATE

[Signature]

7
8 **BEFORE THE BUREAU OF REAL ESTATE**

9 **STATE OF CALIFORNIA**

10 * * *

11 In the Matter of the Accusation of) No. H- 04897 SD
12)
13 **ALI LAREYBI,**) ACCUSATION
14)
15 Respondent.)

16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
17 State of California, for cause of Accusation against ALI LAREYBI ("Respondent"), alleges as
18 follows:

19 1.

20 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
21 State of California, makes this Accusation in her official capacity.

22 2.

23 Respondent is presently licensed under the Real Estate Law, Part 1 of Division 4
24 of the California Business and Professions Code ("Code"), as a real estate broker.

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ACCUSATION OF
ALI LAREYBI

1 (DISCIPLINARY ACTION)

2 3.

3 On or about September 16, 2015, in Case No. S227188, the Supreme Court of
4 California ordered Respondent disbarred from the practice of law in California effective
5 October 16, 2015. As stated more fully in the Decision Including Disbarment Recommendation
6 and Involuntary Inactive Enrollment Order in Case Numbers 13-O-15707 and 13-O-16146 by
7 the State Bar of California, Hearing Department, the State Bar Court held that Respondent
8 committed multiple violations of Business and Professions Code ("Code") Section 6106. The
9 court held that Respondent had committed two violations of Code Section 6106 by willfully
10 misappropriating client funds, one violation of Code Section 6106 by knowingly providing
11 false statements to the State Bar, and one violation of Code Section 6106 by issuing checks
12 from his client trust account when Respondent knew or should have known that the account
13 lacked sufficient funds to cover the checks. The court also concluded that Respondent had
14 committed two (2) willful violations of Rule 4-100(A) of the Rules of Professional Conduct
15 (failing to maintain client funds in a client trust account).

16 4.

17 The allegations set forth in Paragraph 3 above constitute cause under Section
18 10177(f) of the Code for the suspension or revocation of the license and license rights of
19 Respondent under the Real Estate Law.


20 (INVESTIGATION AND ENFORCEMENT COSTS)

21 5.

22 Code Section 10106, provides, in pertinent part, that in any order issued in
23 resolution of a disciplinary proceeding before the Bureau of Real Estate, the Commissioner may
24 request the administrative law judge to direct a licensee found to have committed a violation of
25 this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of
26 the case.

1 WHEREFORE, Complainant prays that a hearing be conducted on the
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3 disciplinary action against all the licenses and license rights of Respondent ALI LAREYBI
4 under the Real Estate Law for the cost of investigation and enforcement as permitted by law,
5 and for such other and further relief as may be proper under other applicable provisions of law.
6

7 Dated at San Diego, California,
8 this 24 day of April, 2017
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10 
11 Veronica Kilpatrick
12 Supervising Special Investigator

13 cc: ALI LAREYBI
14 Veronica Kilpatrick
15 Sacto.
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