

FILED

AUG - 1 2017

BUREAU OF REAL ESTATE

By AL Delous

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BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

\* \* \*

13 In the Matter of the Application of ) No.H-04923 SD

14 )  
15 ALI PAYAM BATIARI, )

16 Respondent. )

STATEMENT OF ISSUES

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18 The Complainant, Veronica Kilpatrick, a Supervising  
19 Special Investigator of the State of California, for Statement of  
20 Issues against ALI PAYAM BATIARI ("Respondent"), is informed and  
21 alleges in her official capacity as follows:  
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23 1. On or about August 4, 2016, Respondent applied to  
24 the Bureau of Real Estate of the State of California for a real  
25 estate salesperson license.  
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1                   2. On or about April 8, 2016, in the State of  
2 Mississippi, Forrest County Justice Court, Respondent was  
3 convicted of four instances of violating Section 73-69-23(b) of  
4 the Professions and Vocations Residential Electronic Protection  
5 Licensing Act-Engaging in Alarm Contracting without a License.

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7                   3. On April 12, 2017, in Marion County, Mississippi,  
8 Respondent was convicted of one count of Mississippi Code 73-69-  
9 23(b) (engaging in alarm contracting without a license).

10                   4. The matters alleged in Paragraphs 3 and 4 are  
11 substantially related to the duties, functions and qualifications  
12 of a real estate licensee.

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14                   5. The matters alleged in Paragraphs 3 and 4 are  
15 grounds to deny Respondent's application under Sections 480(a)(1)  
16 and 10177(b) of the California Business and Professions Code.

17                   The Statement of Issues is brought under the provisions  
18 of Section 10100, Division 4 of the Business and Professions Code  
19 of the State of California and Sections 11500 through 11528 of  
20 the Government Code.

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1 WHEREFORE, the Complainant prays that the above-  
2 entitled matter be set for hearing and, upon proof of the charges  
3 contained herein, that the Commissioner refuse to authorize the  
4 issuance of, and deny the issuance of, a real estate salesperson  
5 license to Respondent, and for such other and further relief as  
6 may be proper under the provisions of law.  
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8 Dated at San Diego, California,

9 this 27<sup>th</sup> day of July, 2017.

10  
11 V. Kilpatrick  
12 VERONICA KILPATRICK  
13 Supervising Special Investigator  
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25 cc: Ali P. Batiari  
26 Veronica Kilpatrick  
27 Sacto.