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FILED

APR 03 2012

DEPARTMENT OF REAL ESTATE

By S. Jones

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Application of)

12 SHAHIN KOUCHAKALI,)

13 Respondent.)

No. H-5800 SAC

STATEMENT OF ISSUES

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16 The Complainant, TRICIA SOMMERS, a Deputy Real Estate Commissioner of
17 the State of California, for Statement of Issues against SHAHIN KOUCHAKALI (hereinafter
18 "Respondent"), is informed and, in her official capacity, alleges as follows:

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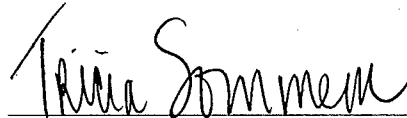
20 Respondent made application to the Department of Real Estate of the State of
21 California for a real estate broker license on or about October 28, 2011.

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23 On or about March 4, 2008, in the Superior Court, County of Santa Clara,
24 Respondent was convicted of a violation of Section 484/488 of the California Penal Code (Petty
25 Theft), a misdemeanor and crime which bears a substantial relationship under Section 2910, Title
26 10, California Code of Regulations, to the qualifications, functions, or duties of a real estate
27 licensee.

The crime for which Respondent was convicted, as alleged above, constitutes cause for denial of Respondent's application for a real estate license under Sections 480(a) and 10177(b) of the California Business and Professions Code.

WHEREFORE, the Complainant prays that the above-entitled matter be set for hearing and, upon proof of the charges contained herein, that the Commissioner refuse to authorize the issuance of, and deny the issuance of, a real estate broker license to Respondent, and for such other and further relief as may be proper under other provisions of law.



TRICIA SOMMERS
Deputy Real Estate Commissioner

Dated at Sacramento, California,

this 7th day of March, 2012.

DISCOVERY DEMAND

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