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1	KYLE T. JONES, Counsel (SBN 300751)
2	Bureau of Real Estate P.O. BOX 137007 FILED
3	Sacramento, CA 95813-7007
4	Telephone: (916) 263-8672 FEB 2 7 2013
5	(916) 263-3767 (Fax) BUREAU OF REAL ESTATE
6	(916) 263-7303 (Direct) By <u>By</u> <u>By</u>
7	
8	BEFORE THE BUREAU OF REAL ESTATE
9	STATE OF CALIFORNIA
10	STATE OF CALIFORNIA
11	In the Matter of the Accusation of
12	) No. H-6650 SAC
13	ELIJAH AIZENBERG, ) ) <u>ACCUSATION</u>
14	Respondent.
15	The Complainant, TRICIA D. PARKHURST, acting in her official capacity as a
16	Supervising Special Investigator of the State of California, for this Accusation against ELIJAH
17	AIZENBERG, also known as "ELIJAH SIMONYAN" ("Respondent"), is informed and alleges
18	as follows:
19	1
20	Respondent is presently licensed and/or has license rights under the Real Estate
21	Law, Part 1 of Division 4 of the Business and Professions Code ("Code") as a real estate
22	salesperson.
-23	CRIMINAL CONVICTION
24	2
25	On or about January 19, 2018, in the United States District Court, Eastern District
26	of California, Case No. 2:12-CR-410-GEB, Respondent was convicted of violating Section 1344
27	(bank fraud), Title 18, of the United States Code, a felony and a crime that bears a substantial

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1	relationship to the qualifications, functions or duties of a real estate licensee pursuant to Section
2	2910, Title 10, of the California Code of Regulations.
3	GROUNDS FOR DISCIPLINE
4	3
5	The facts alleged in Paragraph 2, above, constitute cause under Sections 490
6	(conviction of substantially related crime), 10177(b) (conviction of substantially related crime),
7	and 10177(j) (fraud or dishonest dealing) of the Code for the suspension or revocation of all
8	licenses and license rights of Respondent under the Real Estate Law.
9	COST RECOVERY
10	4
11	The Bureau will seek to recover cost of the investigation and prosecution of this
12	case pursuant to section 10106 of the Code which provides, in pertinent part, that in any order
13	issued in resolution of a disciplinary proceeding before the Bureau, the Commissioner may
14	request the administrative law judge to direct a licensee found to have committed a violation of
15	this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of
16	the case.
17	WHEREFORE, Complainant prays that a hearing be conducted on the allegations
18	of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary
19	action against all licenses and license rights of Respondent under the Real Estate Law, for the
20	cost of investigation and enforcement as permitted by law, and for such other and further relief as
21	may be proper under other provisions of law.
22	Toining I Jonethe and
23	TRICIA D. PARKHURST
24	Supervising Special Investigator
25	
26 27	Dated at Sacramento, California, thisday of2018.
21	uns <u>() v</u> day 01 <u>(v) www.</u> 2018.
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2	DISCOVERY DEMAND
3	Pursuant to Sections 11507.6, et seq. of the Administrative Procedure Act, the
4	Bureau hereby makes demand for discovery pursuant to the guidelines set forth in the
5	Administrative Procedure Act. Failure to provide Discovery to the Bureau may result in the
6	exclusion of witnesses and documents at the hearing or other sanctions that the Office of
7	Administrative Hearings deems appropriate.
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