

FILED

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BUREAU OF REAL ESTATE

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8 **BEFORE THE BUREAU OF REAL ESTATE**

9 **STATE OF CALIFORNIA**

10 * * *

11 In the Matter of the Application of)
12 MOHAMMED EID,) H-6695 SAC
13 Respondent.) STATEMENT OF ISSUES
14)

15 The Complainant, TRICIA D. PARKHURST, a Supervising Special Investigator
16 of the State of California, for Statement of Issues against MOHAMMED EID, (Respondent) is
17 informed and alleges as follows:

18 1

19 Complainant makes this Statement of Issues against Respondent in her official
20 capacity.

21 2

22 Respondent made application to the Bureau of Real Estate of the State of
23 California for a real estate salesperson license on or about March 13, 2017.

24 3

25 In response to Question 27A of said application, to wit: "Complete one line for
26 each violation and provide explanation below. If you are unable to provide this information,
27 provide all the requested information you can obtain, with an explanation for the missing

1 information”, Respondent concealed and failed to disclose the conviction described in Paragraph
2 6, below.

3 4

4 In response to Question 3 of said application, to wit: “Have you ever had a denied,
5 suspended, restricted or revoked business or professional license (including real estate) in
6 California or any other state?”, Respondent answered no and concealed and failed to disclose the
7 denial of a license described in Paragraph 7, below.

8 5

9 On or about April 26, 2001, in the Superior Court of the State of California, County of
10 Los Angeles, Case No. BA 207080-01, Respondent was convicted of violating Section 10980(c)
11 (2) of the California Welfare and Institutions Code (welfare fraud), a felony and a crime that
12 bears a substantial relationship under Section 2910, Title 10, Chapter 6 of the California Code of
13 Regulations (the Regulations), to the qualifications, functions, or duties of a real estate licensee.
14 On or about February 26, 2010, Respondent’s conviction was reduced to a misdemeanor and then
15 expunged pursuant to Section 1203.4 of the California Penal Code.

16 6

17 On or about April 27, 1995, in the Superior Court of the State of California,
18 County of Sacramento, Case No. 94M03464, Respondent was convicted of violating Section
19 11364.7 (a) of the California Health and Safety Code (delivery drugs), a misdemeanor and a
20 crime that bears a substantial relationship under Section 2910 of the Regulations to the
21 qualifications, functions, or duties of a real estate licensee.

22 7

23 PRIOR ADMINISTRATIVE DISCIPLINE

24 Effective on or about February 14, 2005, in Case No H-4110 SAC, the Real Estate
25 Commissioner, denied Respondent’s application for a real estate salesperson license.

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Respondent's criminal convictions, described in Paragraphs 5 and 6, above constitutes cause for denial of Respondent's application for a real estate salesperson license pursuant to the provisions of Sections 480(a) (conviction of crime) and 10177(b) (further grounds for disciplinary action-conviction of crime) of the Code

Respondent's failure to reveal in said application the conviction set forth in Paragraph 6, above, and the prior license discipline set forth in Paragraph 7, above, constitutes the procurement of or attempt to procure a real estate license by fraud, misrepresentation, or deceit, or by making a material misstatement of fact in said application, which failure is cause for denial of Respondent's application for a real estate salesperson license pursuant to the provisions of Sections 480(d) (false statement) and 10177(a) (attempt to procure license through fraud, etc.) of the Code.

Respondent's criminal conviction, as set out in Paragraph 5, above, constitute cause for denial of Respondent's application for a real estate salesperson license pursuant to the provisions of Sections 480(a)(2) and 10177(j) (fraud or dishonest acts) of the Code.

WHEREFORE, 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 salesperson license to Respondent, and for such other and further relief as may be proper under other provisions of law.

Tricia D. Parkhurst
TRICIA D. PARKHURST
Supervising Special Investigator

Dated at Sacramento, California
this 17th day of May, 2018.