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FILED

JAN 24 2024

DEPARTMENT OF REAL ESTATE

By K. Knapp

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)

12 MOHAMMED ARSHAD JALAL,)

13 Respondent.)

No. H-7226 SAC

ACCUSATION

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15 The Complainant, TRICIA D. PARKHURST, acting in her official capacity as a
16 Supervising Special Investigator of the State of California, for cause of Accusation
17 against MOHAMMED ARSHAD JALAL (Respondent), is informed and alleges as follows:

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19 At all times herein mentioned, Respondent was and is presently licensed and/or
20 has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and
21 Professions Code (the Code) by the Department of Real Estate (the Department) as a real estate
22 salesperson.

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24 At no time mentioned herein was Respondent licensed by the Department as a
25 real estate broker.

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Respondent was employed and affiliated with Metropolitan Real Estate & Development, a real estate broker corporation since November 12, 2019. Effective December 11, 2021, Respondent's employment with Metropolitan Real Estate & Development terminated. At no time mentioned herein did Metropolitan Real Estate & Development authorize Respondent to conduct any property management activities.

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At all times herein mentioned, Respondent conducted real estate activity under Respondent's individual salesperson license.

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At all times herein mentioned, Respondent engaged in the business of, acted in the capacity of, advertised, or assumed to act as a real estate broker within the State of California within the meaning of Section 10131 (b) of the Code, including the operation and conduct of a property management business with the public wherein, on behalf of others, for compensation or in expectation of compensation, Respondent leased or rented or offered to lease or rent, or solicited listings of places for rent or solicited for prospective tenants, or negotiated the sale, purchase or exchange of leases on real property, or on a business opportunity, or collected rent from tenants.

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In the course of activities described in Paragraph 5, Respondent, negotiated rental agreement terms, and/or collected rent, on behalf of owners, for compensation, including but not limited to the following:

Date of Lease Agreement	Property Owner	Property Location
2/6/2021	Daniel H.	3719 46 th Avenue, #2, Sacramento
3/18/2021	Sayad H.	5755 Blachly Way, Apt. 1, Sacramento
3/18/2021	Sayad H.	5755 Blachly Way, Apt. 4, Sacramento

In the course of activities described in Paragraph 5, Respondent negotiated rental agreement terms, solicited prospective tenants, and collected rent and security deposits, on behalf of owners, for compensation, including but not limited to the following:

Beginning Date	Property Owner	Property Location
2013	Mohammed F.K.	8565 Willow Grove, Sacramento
12/19/2013	Mohammed F.K.	7725 Robinette Road, Sacramento
7/25/2017	Mohammed F.K.	712 Harris Avenue, Sacramento
1/4/2021	Mohammed F.K.	7737 25 th Street, Sacramento
1/4/2021	Mohammed F.K.	7741 25 th Street, Sacramento
November 2020	Mohammed F.K.	9529 Big Timber Drive, Elk Grove

Respondent continued to perform property management activities until January 2022.

The acts and or omissions described above constitute a violation of Section 10130 (Unlicensed Activity) of the Code, and are grounds for discipline under Sections 10177 (d) (Willful Disregard of Real Estate Laws) and 10177 (g) (Negligence/Incompetence of Licensee) of the Code.

COST RECOVERY

Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, the Real Estate Commissioner may request the Administrative Law Judge to direct a licensee found to have committed a violation of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all licenses and license rights of Respondent under the Code, for the reasonable

1 cost of investigation and agency attorney's fees in this matter, and for such other and further
2 relief as may be proper under other provisions of law.

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5 TRICIA D. PARKHURST
6 Supervising Special Investigator

7 Dated at Sacramento, California,
8 this 22nd day of January 2024.

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10 DISCOVERY DEMAND

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