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**FILED**

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**DEPARTMENT OF REAL ESTATE**  
By B. Nicholas

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

11 To: )  
12 ) NO. H- 12397 SF  
13 PUNEH SOHRABPOUR and )  
14 INTERNATIONAL EXECUTIVE RENTALS, LLC ) ORDER TO DESIST AND REFRAIN  
) (B&P Code Section 10086)

15 The Real Estate Commissioner ("Commissioner") of the State of California has  
16 caused an investigation to be made into the activities of PUNEH SOHRABPOUR  
17 ("SOHRABPOUR") and INTERNATIONAL EXECUTIVE RENTALS, LLC ("IER") that fall  
18 within the meaning of Section 10131 (real estate broker defined) of the California Business &  
19 Professions Code ("the Code"). Based upon the findings of that investigation, as set forth below,  
20 the Commissioner has determined and is of the opinion that:

21 SOHRABPOUR and IER have violated Section 10130 (license required to act as  
22 a real estate broker) of the Code by engaging in the business of or acting as a real estate  
23 salesperson or broker, within the meaning of Section 10131(b) (engaging in property  
24 management activities) of the Code, without first having obtained a real estate license from the  
25 California Department of Real Estate ("Department").

26 Whenever acts referred to below are attributed to SOHRABPOUR, those acts are  
27 alleged to have been done by SOHRABPOUR, acting by herself, or by and/or through one or

1 more known or unknown agents, associates, and/or co-conspirators, limited liability companies,  
2 and using other names or fictitious business names including, but not limited to IER.

3 FINDINGS OF FACT

4 1. At no time within the last three years was SOHRABPOUR licensed in any  
5 capacity by the Department.

6 2. At no time within the last three years was IER licensed in any capacity by the  
7 Department.

8 3. On or about April 3, 2019, IER held itself out as a property management  
9 company at the website located at www.iersf.com, offering a minimum of 19 properties for rent  
10 located within the State of California for or in expectation of compensation.

11 4. On or about April 3, 2019, SOHRABPOUR, via e-mail, solicited with an  
12 undercover Special Investigator to find an apartment for rent in San Francisco, CA for or in  
13 expectation of compensation.

14 5. On or about April 4, 2019, SOHRABPOUR solicited and negotiated with an  
15 undercover Special Investigator to rent the property located at 2250 Green Street, Unit 6, San  
16 Francisco, CA 94123 for or in expectation of compensation.

17 6. SOHRABPOUR does not own the property located at 2250 Green Street, Unit  
18 6, San Francisco, CA 94123.

19 7. IER does not own the property located at 2250 Green Street, Unit 6, San  
20 Francisco, CA 94123.

21 CONCLUSIONS OF LAW

22 8. Based on the findings of fact contained in paragraphs 1 through 7, above,  
23 SOHRABPOUR and IER, among other things, solicited and/or performed services for landlords,  
24 including but not limited to soliciting for prospective tenants, negotiating leases, and collecting  
25 rents from real property or improvements thereon on behalf of landlords, for or in expectation of  
26 compensation in violation of Sections 10130 and 10131(b) of the Code.

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1 DESIST AND REFRAIN ORDER

2 PUNEH SOHRABPOUR, whether doing business under her own name, or any  
3 other names or fictitious names, IS HEREBY ORDERED to immediately desist and refrain from  
4 performing any and all acts within the State of California for which a real estate license is  
5 required, unless and until she obtains a real estate broker license issued by the Department.

6 INTERNATIONAL EXECUTIVE RENTALS, LLC., whether doing business  
7 under its own name, or any other names or fictitious names, IS HEREBY ORDERED to  
8 immediately desist and refrain from performing any and all acts within the State of California for  
9 which a real estate license is required, unless and until it obtains a real estate broker license  
10 issued by the Department.

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13 DATED: October 4, 2019

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16 ACTING REAL ESTATE COMMISSIONER

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19 DANIEL J. SANDRI  
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-NOTICE-

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Business and Professions Code Section 10139 provides that "Any person acting as a real estate broker or real estate salesperson without a license or who advertises using words indicating that he or she is a real estate broker without being so licensed shall be guilty of a public offense punishable by a fine not exceeding twenty thousand dollars (\$20,000), or by imprisonment in the county jail for a term not to exceed six months, or by both fine and imprisonment; or if a corporation, be punished by a fine not exceeding sixty thousand dollars (\$60,000)...."