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DEPARTMENT OF REAL ESTATE
By J. Taggart

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)

12 MANSUR ARIF ZAHIR,)

13 Respondent.)

No. H-12713 SF

ACCUSATION

14 The Complainant, STEPHANIE YEE, a Supervising Special Investigator of the
15 State of California, for cause of Accusation against MANSUR ARIF ZAHIR, (Respondent), is
16 informed and alleges as follows:

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18 Complainant makes this Accusation against Respondent in her official capacity.

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

24 3

25 On or about August 9, 2021, in the Superior Court of the State of California,
26 County of Santa Clara, Case No. C2008045, Respondent was convicted of violating Section
27 243(a) of the California Penal Code (battery), a misdemeanor which bears a substantial

1 relationship under Section 2910, Title 10, California Code of Regulations, to the qualifications,
2 functions, or duties of a real estate licensee.

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4 The facts alleged above constitute cause under Section 10177(b) (Further Grounds
5 for Disciplinary Action- Conviction of Crime) and Section 490 (Conviction Substantially
6 Related Crime) of the Code for suspension or revocation of Respondent's license under the Real
7 Estate Law.

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9 A diligent search was made of the records of the Department of Real Estate
10 (Department), relating to Respondent's Real Estate Broker License. As a result of said search,
11 no record was discovered having been received from Respondent notifying the Department, in
12 writing, of any conviction.

13 6

14 The facts alleged above, in Paragraphs 3 and 5, constitute a violation of Section
15 10186.2 (failure to report in writing, a conviction within 30 days) of the Code, and are grounds
16 for revocation of all licenses and license rights of Respondent under Section 10177^d(b) of the
17 Code.

18 7

19 Section 10106 of the Code provides, in pertinent part, that in any order issued
20 in resolution of a disciplinary proceeding before the Department, the commissioner may request
21 the administrative law judge to direct a licensee found to have committed a violation of this part
22 to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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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 costs of investigation and prosecution of this case, including agency attorney's fees and for such other and further relief as may be proper under provisions of law.

Johnnie Yu

STEPHANIE YEE

Supervising Special Investigator

Dated at Oakland, California

this 2nd day of November, 2023.

DISCOVERY DEMAND

The Department of Real Estate hereby requests discovery pursuant to Section 11507.6 of the California Government Code. Failure to provide discovery to the Department may result in the exclusion of witnesses and/or documents at the hearing, and other sanctions as the Administrative Law Judge deems appropriate.