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DEC 14 2023
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

FIRST AMENDED ACCUSATION

14 The Complainant, Stephanie Yee, a Supervising Special Investigator of the State
15 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. Respondent also holds a Mortgage Loan Originator Endorsement. (MLO Endorsement)

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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
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1 243(a) of the California Penal Code (battery), a misdemeanor which bears a substantial
2 relationship under Section 2910, Title 10, California Code of Regulations, to the qualifications,
3 functions, or duties of a real estate licensee.

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

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

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

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

24 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
25 of this Accusation and that upon proof thereof, a Decision be rendered imposing disciplinary
26 action against all licenses and license rights of Respondent under the Code, for the reasonable
27 costs of investigation and prosecution of this case, including agency attorney's fees and for such

1 other and further relief as may be proper under provisions of law.
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4 STEPHANIE YEE
5 Supervising Special Investigator

6 Dated at Oakland, California
7 this 8th day of December, 2023.

8 DISCOVERY DEMAND
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10 The Department of Real Estate hereby requests discovery pursuant to Section
11 11507.6 of the California Government Code. Failure to provide discovery to the Department
12 may result in the exclusion of witnesses and/or documents at the hearing, and other sanctions
13 as the Administrative Law Judge deems appropriate.
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