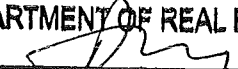


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**FILED**

FEB - 8 2013

DEPARTMENT OF REAL ESTATE  
BY: 

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Application of ) No. H- 38696 LA  
12 SHAYAN GHALARI, )  
13 Respondent. )  
14 )

15 The Complainant, Robin Trujillo, a Deputy Real Estate  
16 Commissioner of the State of California, acting in her official  
17 capacity, for Statement of Issues against SHAYAN GHALARI  
18 ("Respondent") alleges as follows:

19 1.

20 On or about August 23, 2011, Respondent made  
21 application to the Department of Real Estate of the State of  
22 California for a real estate salesperson license.

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1 (CRIMINAL CONVICTIONS)

2 2.

3 On or about August 31, 2005, in the Superior Court of  
4 California, County of Los Angeles, Case No. 5PN03877, Respondent  
5 was convicted of violating Vehicle Code Section 23103(a)  
6 (Reckless Driving) and Penal Code Section 484(a) (Theft), both  
7 misdemeanors. Said crimes bear a substantial relationship to  
8 the qualifications, functions or duties of a real estate  
9 licensee under Section 2910, Title 10, Chapter 6, California  
10 Code of Regulations.

11 3.

12 On or about December 19, 2007, in the Superior Court  
13 of California, County of Los Angeles, Case No. 7GN03667,  
14 Respondent was convicted of violating Penal Code Section 415  
15 (Disturbing the Peace), a misdemeanor. Said crime bears a  
16 substantial relationship to the qualifications, functions or  
17 duties of a real estate licensee under Section 2910, Title 10,  
18 Chapter 6, California Code of Regulations.

19 4.

20 On or about July 5, 2012, in the Superior Court of  
21 California, County of Los Angeles, Case No. BA389590, Respondent  
22 was convicted of violating Penal Code Section 243(d) (Battery  
23 with Serious Bodily Injury), a misdemeanor. Said crime bears a  
24 substantial relationship to the qualifications, functions or  
25 duties of a real estate licensee under Section 2910, Title 10,  
26 Chapter 6, California Code of Regulations.

27 ///

1 5.

2 The crimes of which Respondent was convicted as  
3 alleged above, constitute cause for denial of Respondent's  
4 application for a real estate license under Business and  
5 Professions Code Sections 475(a)(2), 480(a), and 10177(b).

6  
7 These proceedings are brought under the provisions of  
8 Section 10100, Division 4 of the Business and Professions Code  
9 of the State of California and Sections 11500 through 11528 of  
10 the California Government Code.

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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, SHAYAN GHALARI, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California: February 7, 2013.

  
\_\_\_\_\_  
Robin Trujillo  
Deputy Real Estate Commissioner

cc: Shayan Ghalari  
Robin Trujillo  
Sacto.