FILED AMELIA V. VETRONE, Counsel (SBN 134612) 1 Bureau of Real Estate 2 - APR 18 2014 320 West 4th Street, Suite 350 Los Angeles, California 90013-1105 3 DEPARTMENT OF REAL ESTATE Telephone: (213) 576-6982 4 (Direct) (213) 576-6940 5 6 7 8 BEFORE THE BUREAU OF REAL ESTATE 9 STATE OF CALIFORNIA 10 11 In the Matter of the Accusation of No. H- 39414 LA 12 ACCUSATION HOSSEIN AFSHARI, 13 Respondent. 14 15 The Complainant, Robin Trujillo, a Deputy Real Estate Commissioner of the 16 State of California, acting in her official capacity, for cause of Accusation against HOSSEIN 17 AFSHARI aka Hossein Kalani Afshari aka Nima aka Sam Afshari aka Hossein Deklami aka Hossein Afsharie ("Respondent") alleges as follows: 18 19 1. 20 Respondent is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code ("Code"), as a real 21 estate salesperson. 22 23 /// /// 24 25 /// 26 ///

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## (CRIMINAL CONVICTION)

2.

On or about February 19, 2013, in the United States District Court for the Central District of California, in Case No. CR 01-0209(C)-DOC, Respondent was convicted of violating two counts of Title 18 United States Code Section 2339B(a)(1) (Conspiracy to Provide and Providing Material Support or Resources to Designated Foreign Terrorist Organization), a felony. This crime is substantially related to the qualifications, functions or duties of a real estate licensee under Section 2910, Title 10, Chapter 6, California Code of Regulations.

3.

The crime of which Respondent was convicted, as alleged above, constitutes cause under Sections 490 and 10177(b) of the Business & Professions Code for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

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California Business and Professions Code Section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Bureau, the 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 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 the licenses and license rights of Respondent, HOSSEIN AFSHARI, under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code), for the costs of investigation and enforcement as provided by law, and for such other and further relief as may be proper under other applicable provisions of law. Dated at Los Angeles, California:

March 2 Robin Truillo Deputy Real Estate Commissioner

cc: Hossein Afshari GCSA Inc. / Gregory Cornwell Robin Trujillo

Sacto.