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FILED

DEC 21 2015

BUREAU OF REAL ESTATE

By *AM Soria*

9 **BEFORE THE BUREAU OF REAL ESTATE**

10 **STATE OF CALIFORNIA**

11 * * *

12 In the Matter of the Accusation of) No. H- 40073 LA
13 NABILA EBRAHIMI,) ACCUSATION
14 Respondent.)
15 _____)

16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
17 State of California, for cause of Accusation against NABILA EBRAHIMI ("Respondent"), is
18 informed and alleges as follows:

19 1.

20 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
21 State of California, makes this Accusation in her official capacity.

22 2.

23 Respondent presently has license rights under the Real Estate Law, Part 1 of
24 Division 4 of the California Business and Professions Code ("Code"), as a real estate broker.
25 On June 20, 2015, Respondent's license expired. Pursuant to Code Section 10201, Respondent
26 retains renewal rights for two years. The Bureau of Real Estate holds jurisdiction over the
27 lapsed license, pursuant to Code Section 10103.

Accusation of Nabila Ebrahimi

1 3.

2 On or about September 30, 2014, Respondent pled nolo contendere and was
3 convicted in the Superior Court of California, County of Los Angeles, Case No. 3PS02598, for
4 violation of California Vehicle Code Section 20002(a) (Hit And Run), a misdemeanor.
5 Respondent was placed on two years of summary probation, and ordered to serve one day in jail
6 and pay fines and fees.

7 4.

8 The conviction described in Paragraph 3 bears a substantial relationship under
9 Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications,
10 functions or duties of a real estate licensee.

11 5.

12 The crime of which Respondent was convicted, as described in Paragraph 3
13 above, constitutes cause under Sections 490 and 10177(b) of the Code for the suspension or
14 revocation of the license and license rights of Respondent under the Real Estate Law.

15 6.

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

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1 WHEREFORE, Complainant prays that a hearing be conducted on the
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3 disciplinary action against all the licenses and license rights of Respondent NABILA
4 EBRAHIMI under the Real Estate Law, for the cost of investigation and enforcement as
5 permitted by law, and for such other and further relief as may be proper under other applicable
6 provisions of law.

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8 Dated at San Diego, California

9 this 14th day of December, 2014

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12 _____
13 Veronica Kilpatrick
14 Supervising Special Investigator

14 cc: NABILA EBRAHIMI
15 Veronica Kilpatrick
16 Sacto.

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Accusation of Nabila Ebrahimi