

1 Julie L. To, Counsel (SBN 219482)  
2 Bureau of Real Estate  
3 320 West 4th Street, Suite 350  
4 Los Angeles, California 90013  
5 Telephone: (213) 576-6982  
6 (Direct) (213) 576-6916

**FILED**

**JUL 21 2017**

**BUREAU OF REAL ESTATE**

By John Guik

8 **BEFORE THE BUREAU OF REAL ESTATE**  
9 **STATE OF CALIFORNIA**

10 \* \* \*

11 In the Matter of the Application of ) No. H-40725 LA  
12 )  
13 EDMOND AKOPYAN, ) STATEMENT OF ISSUES  
14 ) Real Estate Salesperson  
15 Respondent. )

16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the  
17 State of California, for Statement of Issues against EDMOND AKOPYAN ("Respondent")  
18 alleges as follows:

19 1.

20 The Complainant makes this Statement of Issues against Respondent in her  
21 official capacity as a Supervising Special Investigator of the State of California.

22 2.

23 On or about August 15, 2016, Respondent submitted an application (Form RE  
24 435, Rev. 1/16) to the Bureau of Real Estate ("BRE" or "Bureau") of the State of California for  
25 a real estate salesperson license ("August 15, 2016 application").

26 ///

1 FIRST CAUSE FOR DENIAL

2 (CRIMINAL CONVICTIONS)

3 3.

4 May 11, 1999: Penal Code Section 470(A) (felony)

5 On or about May 11, 1999, in the Superior Court of the State of California,  
6 County of Los Angeles, in Case No. LA031714, Respondent pled *nolo contendere* to and was  
7 convicted for violation of PC Section 470(A) (forgery of a document), a felony. On or about  
8 June 16, 1999, Respondent was sentenced to three (3) years formal probation and ordered to  
9 serve ninety (90) days in jail and pay restitution to the victim in the amount of \$200.00. On or  
10 about December 12, 2000, Respondent admitted to violation of probation, and probation was  
11 revoked, then reinstated with the modification to order Respondent to perform ten (10) days of  
12 Cal Trans service. On or about August 16, 2002, probation was ordered terminated pursuant to  
13 Penal Code ("PC") 1203.3 and Respondent's plea and conviction were set aside; a plea of not  
14 guilty was entered; the offense was reduced to a misdemeanor; and the case was dismissed  
15 pursuant to PC 1203.4.

16 4.

17 December 12, 2000: Vehicle Code Section 10752 211 (Misdemeanor)

18 On or about December 12, 2000, in the Superior Court of the State of California,  
19 County of Los Angeles, in Case No. OGL03400, Respondent pled *nolo contendere* to and was  
20 convicted for violation of Vehicle Code ("VC") Section 10752 (illegal possession/sale of a  
21 vehicle identification number), a misdemeanor. On the same day, Respondent was sentenced to  
22 three (3) years summary probation and ordered to perform ten (10) days of Cal Trans service  
23 and pay fines and assessments. On or about July 16, 2002, probation was ordered terminated  
24 pursuant to PC 1203.3. On or about August 13, 2002, Respondent's plea was set aside; a plea  
25 of not guilty was entered; and the complaint was dismissed. As part of the court's PC 1203.4  
26  
27

1 dismissal, Respondent was required to disclose the conviction “in response to any direct  
2 question contained in any questionnaire or application for public office or for licensure by any  
3 state or local agency...”

4 5.

5 These crimes, by their facts and circumstances, bear a substantial relationship to  
6 the qualifications, functions or duties of a real estate licensee under Section 2910, Title 10,  
7 Chapter 6, California Code of Regulations.

8 6.

9 The crimes of which Respondent was convicted constitute cause for denial of  
10 Respondent’s application for a real estate license under **California Business and Professions**  
11 **Code Sections 475(a)(2), 480(a)(1), and 10177(b).**

12 SECOND CAUSE FOR DISCIPLINE

13 (FAILURE TO DISCLOSE)

14 7.

15 In response to Question 28 of his August 15, 2016 application, to wit: “HAVE  
16 YOU EVER BEEN CONVICTED (SEE PARAGRAPH ABOVE<sup>1</sup>) OF ANY VIOLATION OF  
17 THE LAW AT THE MISDEMEANOR OR FELONY LEVEL? IF YES, COMPLETE ITEM  
18 34 WITH INFORMATION ON EACH CONVICTION.” Respondent answered “No,” and  
19 revealed neither of the convictions described in Paragraphs 3 and 4, above; Respondent did not  
20 reveal anywhere on his application the convictions described in Paragraphs 3 and 4, above.

21 ///

22 ///

23  
24 \_\_\_\_\_  
25 <sup>1</sup> The BRE’s RE 435 Real Estate Salesperson application includes in the “Background Information” section a box  
26 that contains information regarding “Convicted” categories. “Convicted” includes: “...Convictions expunged under  
27 Penal Code sections 1203.4, 1203.4a and 1203.41 or equivalent non-California statute must still be disclosed.  
Proof that a conviction has been expunged under Penal Code sections 1203.4, 1203.4a and 1203.41 must be  
submitted with the application.”

1 8.


2 Respondent's failure to reveal the convictions set forth herein in Paragraphs 3  
3 and 4 on his August 15, 2016 real estate salesperson license application constitutes the attempt  
4 to procure a real estate license by fraud, misrepresentation, or deceit, or by knowingly making a  
5 false statement of material fact required to be revealed in said application, and constitutes cause  
6 under Code Sections 475(a)(1), 480(d) and 10177(a) for the denial of Respondent's real estate  
7 license application under the Real Estate Law.

8 9.

9 These proceedings are brought under the provisions of Section 10100, Division  
10 4 of the Business and Professions Code of the State of California and Sections 11500 through  
11 11528 of the California Government Code.

12 WHEREFORE, the Complainant prays that the above-entitled matter be set for  
13 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to  
14 authorize the issuance of, and deny the issuance of, a real estate salesperson license to  
15 Respondent, EDMOND AKOPYAN, and for such other and further relief as may be proper  
16 under other applicable provisions of law.

17 Dated at Los Angeles, California: July 17, 2017.

18  
19   
20 Veronica Kilpatrick  
21 Supervising Special Investigator

22  
23  
24 cc: EDMOND AKOPYAN  
25 Veronica Kilpatrick  
26 Sacto.  
27