

1 2 3	DIANE LEE, Counsel (SBN 247222) Department of Real Estate 320 West 4th Street, Suite 350 Los Angeles, California 90013		
4 5		213) 576-6982 213) 576-6907	
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DENT. OF HEAL ESTATE
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BEFORE THE DEPARTMENT OF REAL ESTATE STATE OF CALIFORNIA

* * *

In	the Matter of the Accusation of)	No. H- 41545 LA
	JUSTIN OMID MONEMPOUR,)	ACCUSATION
	Respondent.)	
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The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California for cause of Accusation against JUSTIN OMID MONEMPOUR ("Respondent") alleges as follows:

1.

The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California, makes this Accusation in her official capacity.

2.

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 as a real estate broker (license no. 01403877).

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3.

On or about October 31, 2018, in the Superior Court of California, County of Los Angeles, case no. BA467176, Respondent was convicted of California Insurance Code section 11880(a) (workers' compensation insurance fraud), a misdemeanor. In part, Respondent was sentenced to serve one (1) year of summary probation, perform 250 hours of community services, and pay various fines and fees. 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.

4.

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

(FAILURE TO REPORT CONVICTION)

5.

As of March 27, 2019, Respondent has failed to report the conviction, as described in Paragraph 3, above, to the Department of Real Estate.

6.

Respondent's failure to report the conviction, as described in described in Paragraph 3, above, constitutes cause under California Business and Professions Code section 10186.2 for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

(COSTS)

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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 department, 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.

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 licenses and/or license rights under the Real Estate Law (Part 1 of Division 4 of the California Business and Professions Code) of Respondent JUSTIN OMID MONEMPOUR for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under applicable provisions of law.

Dated at Los Angeles, California:

_, 2019.

Maria Suarez

Supervising Special Investigator

JUSTIN OMID MONEMPOUR

Maria Suarez

Sacto.