

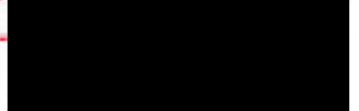
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BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

In the Matter of the Accusation of:

No. H-42942-LA

JEREMY DARAB HAKIMI,

ACCUSATION

Respondent.

The Complainant, Jason Parson, a Supervising Special Investigator for the Department of Real Estate (“Department” or “DRE”) of the State of California, for cause of Accusation against JEREMY DARAB HAKIMI, also known as Jeremy Hakimi (“Respondent”), is informed and alleges in his official capacity as follows:

1. The Complainant, Jason Parson, acting in his official capacity as a Supervising Special Investigator, makes this Accusation against Respondent.
2. Respondent presently has license rights under the Real Estate Law, Part I of Division 4 of the California Business and Professions Code (“Code”), as a real estate broker (DRE license identification number 01715824).

CAUSE OF ACCUSATION

(LICENSE DISCIPLINE BY AGENCY OF ANOTHER STATE)

3. On or about January 9, 2023, the Massachusetts Board of Registration of Real Estate Brokers and Salespersons (“Massachusetts Board”) issued an Order to Show Cause against Respondent in the case of *In the Matter of Jeremy Hakimi*, Investigative Intake Record No. RE-

ACCUSATION

1 2021-000427-IT-ENF (“Order to Show Cause”), ordering Respondent to appear and show cause
2 why the Massachusetts Board should not fine, suspend, revoke, or otherwise take action against
3 Respondent’s license to practice in the real estate profession in the Commonwealth of
4 Massachusetts, License No. 149147-B (exp. 1/22/24), or his right to renew thereof. The
5 Massachusetts Order alleged that:

6 a. On or about August 8, 2011, the Massachusetts Board issued Respondent a
7 license to practice as a real estate broker, in the Commonwealth of Massachusetts, License
8 No. 149147-B.

9 b. On or about January 16, 2016, Respondent’s license expired.

10 c. Upon seeking renewal, Respondent was notified that he was required to take
11 12 hours of Continuing Education Courses.

12 d. On or about May 17, 2021, Respondent represented to the Massachusetts
13 Board that he completed 12 hours of Continuing Education Courses within seven (7) hours
14 by taking multiple classes at the same time.

15 e. Respondent’s conduct, as described above, was in violation of Massachusetts
16 General Laws (“G.L.”) chapter 112, section 61(5) for engaging in dishonesty, fraud, or deceit
17 which is reasonably related to the practice of the profession.

18 f. Respondent’s conduct, as described above, was in violation of Code of
19 Massachusetts Regulations (“CMR”) title 254, section 2.14, for falsely verifying to the
20 Massachusetts Board that he completed continuing education courses on his license renewal.

21 g. Respondent’s conduct, as described above, constituted engaging in conduct
22 which placed into question Respondent’s competence to practice the profession in violation
23 of G.L. chapter 112, section 61(1).

24 h. Respondent’s conduct, as described above, constituted violations of
25 Massachusetts Board statutes and/or regulations and subjected Respondent’s license to
26 discipline pursuant to G.L. chapter 112, section 61(3).

27 i. Respondent’s conduct also constituted unprofessional conduct and conduct
28 which undermined the public confidence in the integrity of the real estate profession. *Kvitka*

1 *v. Board of Registration in Medicine*, 407 Mass. 140, *cert. denied*, 498 U.S. 823 (1990);
2 *Raymond v. Board of Registration in Medicine*, 387 Mass. 708; 713 (1982).

3 4. On or about June 26, 2023, before the Massachusetts Board, in the case of *In the*
4 *Matter of Jeremy Hakimi*, Docket No. RE-2021-000427-IT-ENF, Respondent entered into a
5 Consent Agreement with the Massachusetts Board in resolution of the allegations stated in the Order
6 to Show Cause. The Consent Agreement was executed by the Massachusetts Board and had an
7 Effective Date of July 3, 2023.

8 5. In the Consent Agreement, Respondent acknowledged that based upon the
9 allegations of the Order to Show Cause, facts existed by which the Massachusetts Board could find
10 that he was: in violation of G.L. chapter 112, section 65A for engaging in dishonesty, fraud, or deceit
11 which is reasonably related to the practice of the profession; and in violation of 254 CMR section
12 2.14, for falsely verifying to the Massachusetts Board that he completed continuing education
13 courses on his license renewal, which was in violation of G.L. chapter 112, section 61(3). In order
14 to completely resolve the matter without a hearing, Respondent agreed to the following, among
15 other things, in the Consent Agreement:

16 a. Payment of a Civil Administrative Penalty in the amount of \$500.00.

17 b. The Massachusetts Board would place Respondent's license to practice as a
18 real estate broker, License No. 149147-B, under a suspension for a period of 90 days,
19 effective as of the Effective Date of the Consent Agreement. During this suspension, period,
20 Respondent agreed to cease practicing in the real estate profession in the Commonwealth of
21 Massachusetts. Respondent understood and acknowledged that any evidence of practicing
22 in the real estate profession during the suspension period may be considered unlicensed
23 practice.

24 c. Respondent understood and agreed that the disciplinary action described in
25 the Consent Agreement is a final act, which is not subject to reconsideration, appeal or
26 judicial review, and Respondent waived his rights to an administrative hearing regarding this
27 matter, and to appeal the administrative action under the provisions of G.L. chapter 30A or
28 any other related law.

1 d. Respondent agreed to complete the continuing education course and remit
2 written verification to the Massachusetts board within 90 days of the Effective Date of the
3 Consent Agreement.

4 e. Respondent understood that he had the right to a formal hearing concerning
5 the allegations against him and that during said adjudication, he would possess the rights to
6 confront and cross-examine witnesses, to call witnesses, to present evidence, to testify on
7 his own behalf, to contest the allegations, to present oral argument, to appeal to the courts,
8 and all other rights set forth in the Massachusetts State Administrative Procedure Act, G.L.
9 chapter 30A, and the Standard Adjudicatory Rules of Practice and Procedure, 801 CMR
10 section 1.00 et seq. Respondent also understood that by executing the Consent Agreement,
11 he knowingly and voluntarily waived his right to a formal hearing and to all of the above-
12 listed rights attendant thereto.

13 6. Respondent's acts and/or omissions in violation of Massachusetts General Laws
14 chapter 112, section 65A for engaging in dishonesty, fraud, or deceit which is reasonably related to
15 the practice of the profession, and in violation of 254 CMR section 2.14, for falsely verifying to the
16 Massachusetts Board that he completed continuing education courses on his license renewal, which
17 was in violation of G.L. chapter 112, section 61(3), if done by a real estate licensee, would be
18 grounds for the suspension or revocation of a California real estate license under Code section
19 10177(a).

20 7. The prior license action against Respondent, as alleged in Paragraphs 3 through 5
21 above, constitutes cause for the suspension or revocation of the license or license rights of
22 Respondent under Code section 10177(f).

23 (COSTS OF INVESTIGATION AND ENFORCEMENT)

24 8. California Business and Professions Code section 10106, provides, in pertinent part,
25 that in any order issued in resolution of a disciplinary proceeding before the Department of Real
26 Estate, the Commissioner may request the administrative law judge to direct a licensee found to
27 have committed a violation of this part to pay a sum not to exceed the reasonable costs of the
28 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 JEREMY DARAB HAKIMI under the Real Estate Law, for the costs of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated July 22, 2024, at Los Angeles, California.



Jason Parson
Supervising Special Investigator

cc: JEREMY DARAB HAKIMI
Empire Capital Group Inc.
Jason Parson
Sacto.