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**FILED**

JUL 29 2024

DEPT. OF REAL ESTATE

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BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

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In the Matter of the Accusation of  
NICK ROSHDIEH,  
Respondent.

No. H-42952-LA  
ACCUSATION

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 NICK ROSHDIEH, also known as Nick A. Roshpieh, Nick A. Roshier, Nick Ali Orshdieh, Nick A. Roshdiem, Ali Roshdieh, and Nick Ali Roshdieh ("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 1 of Division 4 of the California Business and Professions Code ("Code"), as a real estate salesperson ("RES") (DRE license identification number 01339587).

FIRST CAUSE OF ACCUSATION

(CRIMINAL CONVICTION)

3. On or about September 1, 2023, in the United States District Court for the Central District of California, in the case of *United States v. Nick Roshdieh, et al.*, Case No. SACR 21-00221-JLS-1, Respondent was convicted based on his guilty plea for violations of Title 18 of the

ACCUSATION

1 United States Code ("U.S.C."), sections 371 (conspiracy (Count 1)) and 220(a)(2) (illegal  
2 remunerations for referral to clinical treatment facilities (Count 5)), both of which are felonies. The  
3 court sentenced Respondent to committed to the custody of the Federal Bureau of Prisons to be  
4 imprisoned for a term of 18 months on each count, to be served concurrently, and ordered that  
5 Respondent pay a special assessment of \$200.00 and a fine of \$15,000.00, and that upon release  
6 from imprisonment, Respondent be placed on supervised release for a term of three (3) years subject  
7 to terms and conditions including but not limited to: not working for, owning, or otherwise receiving  
8 revenues from any addiction treatment facility, sober living home, urinalysis facility, or any business  
9 otherwise providing addiction treatment; not being employed by, affiliated with, owning, controlling,  
10 volunteering for, or otherwise participating, directly or indirectly, in any business involving  
11 federally funded or state funded health insurance or entitlement programs without the express  
12 written approval of the Probation Officer prior to engaging in such employment; and reporting this  
13 conviction to the California Department of Real Estate.

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

17 5. The crime for which Respondent was convicted, as described in Paragraph 3 above,  
18 constitutes cause under Code sections 490 and 10177(b) for the suspension or revocation of the  
19 license and license rights of Respondent under the Real Estate Law.

## 20 SECOND CAUSE OF ACCUSATION

### 21 (FAILURE TO REPORT FELONY CHARGES AND CONVICTION)

22 6. The Complainant realleges and incorporates by reference all of the allegations  
23 contained in paragraphs 1 through 5 above, with the same force and effect as though fully set forth  
24 herein.

25 7. On or about December 15, 2021, in the United States District Court for the Central  
26 District of California, in the case of *United States v. Nick Roshdieh, et al.*, Case No. SACR 21-  
27 00221-JLS-1, an indictment was filed charging Respondent with violations of 18 U.S.C. sections  
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1 371 (conspiracy (Count 1)) and 220(a)(2), 2 (illegal remunerations for referral to clinical treatment  
2 facilities (Counts 2 through 7)), all of which are felonies.

3 8. Pursuant to Section 10186.2 of the Code, a licensee shall report, in writing, "The  
4 bringing of a criminal complaint, information, or indictment charging a felony against the licensee,"  
5 and "The conviction of the licensee, including any verdict of guilty, or plea of guilty or no contest,  
6 of any felony or misdemeanor" to the Department within thirty (30) days of the of the date of the  
7 bringing of the indictment or the charging of a felony, and of the conviction. Respondent failed to  
8 report in writing to the Department the bringing of an indictment charging felonies against him as  
9 alleged in Paragraph 7 above, and failed to report his conviction described in Paragraph 3 above,  
10 within thirty (30) days of the bringing of an indictment charging felonies against him and of his  
11 conviction.

12 9. Respondent's failure to timely report the bringing of the felony indictment and his  
13 conviction violates Code section 10186.2 and constitutes cause under Code sections 10186.2 and  
14 10177(d) for the suspension or revocation of the license and license rights of Respondent under the  
15 Real Estate Law.

#### 16 COSTS

#### 17 (COSTS OF INVESTIGATION AND ENFORCEMENT)

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

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

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7 Dated July 25, 2024, at Los Angeles, California.

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10   
11 Jason Parson  
12 Supervising Special Investigator

13 cc: NICK ROSHDIEH  
14 Real Estate of the Pacific Inc.  
15 Jason Parson  
16 Sacto.  
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