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**FILED**

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DEPT. OF REAL ESTATE

By- [REDACTED]

7 DEPARTMENT OF REAL ESTATE

8 BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY

9 STATE OF CALIFORNIA

10 In the Matter of the Accusation against

DRE Case No.: H-43196 LA

11 SOLEMON SLAY NIAZI,

12 Respondent.

ACCUSATION

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14 The Complainant, Ray Dagnino a Supervising Special Investigator for the Department  
15 of Real Estate<sup>1</sup> ("Department") of the State of California, makes this Accusation in his official  
16 capacity, for cause of Accusation against SOLEMON SLAY NIAZI ("Respondent"), is  
17 informed and alleges as follows:

18 1. All references to the "Code" are to the California Business and Professions  
19 Code, all references to the "Real Estate Law" are to Part 1 of Division 4 of the Code, and all  
20 references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

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24 <sup>1</sup> Between July 1, 2013, and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate under the Department of Consumer Affairs.

2. Respondent is licensed and/or has license rights under the Real Estate Law (Part 1 of Division 4 of the Code).

### STATEMENT OF FACTS

#### License

3. On May 5, 2003, the Department issued a real estate salesperson license to Respondent, License ID 01380358. Respondent's real estate salesperson license shall expire on May 4, 2027, unless renewed. Respondent has renewal rights pursuant to Code section 10201. The Department retains jurisdiction pursuant to Code section 10103.

#### First Cause of Accusation-2024 Conviction

4. On or about October 14, 2024, before the Superior Court of California, County of Riverside, in Case No. CN457907, Respondent entered a plea of guilty to, and was convicted of, violating one count of Penal Code section 273.5(a)(4) (inflict corporal injury resulting in traumatic condition upon spouse), a felony.

5. The nature, gravity, and underlying circumstances surrounding the 2024 conviction alleged above in Paragraph 4, bear a substantial relationship to the qualifications, functions or duties of a real estate licensee under Regulation 2910.

6. Respondent's 2024 conviction constitutes cause under Code sections 490 and 10177, subdivision (b), for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

#### Second Cause of Accusation - Failure to Disclose

7. There is hereby incorporated in this Second, separate and distinct Cause of Accusation all of the allegations contained in Paragraphs 1 through 6, with the same force and effect as if herein fully set forth.

8. Code section 10186.2, subdivision (a)(1)(B), requires that licensees report the bringing of a felony criminal complaint and felony or misdemeanor convictions. Code section 10186.2, subdivision (a)(2), requires that licensees make a report in writing to the Department within 30 days of the bringing of the indictment, the charging of a felony, or a conviction. Failure to make a report constitutes cause for discipline under Code section 10186.2, subdivision (b).

9. A diligent search was made of the Department's records for Respondent, and no record of timely written notice was found to have been received from Respondent notifying the Department of Respondent's 2024 conviction, as described above in Paragraph 4.

10. Respondent's failure to provide timely written notice to the Department, pursuant to Code section 10186.2, constitutes cause for the suspension or revocation of Respondent's real estate license and license rights under Code section 10186.2, subdivision (b), and Code section 10177, subdivisions (d), and/or (g).

### COST RECOVERY

11. 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 the 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  
3 against all licenses and license rights of Respondent under the Real Estate Law (Part 1 of  
4 Division 4 of the Business and Professions Code), for the cost of investigation and enforcement  
5 as permitted by law, and for such other and further relief as may be proper under other  
6 provisions of law.

7 Dated Nov 18, 2025 at Los Angeles, California.

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9 RAY DAGNINO  
10 Supervising Special Investigator

11 cc: Solemon Slay Niazi  
12 Zabi Tokhi  
13 Ray Dagnino  
14 Sacto.  
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