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FILED
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DEPT. OF REAL ESTATE
By [redacted]

BEFORE THE DEPARTMENT OF REAL ESTATE

BUSINESS AND CONSUMER SERVICES AGENCY

STATE OF CALIFORNIA

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In the Matter of the Accusation against MANUCHEHR KHOSHBIN, Respondent.	DRE No. H-43316 LA **ACCUSATION**

The Complainant, Ray Dagnino, a Supervising Special Investigator for the Department of Real Estate[1] ("Department") of the State of California, makes this Accusation in his official capacity for cause of Accusation against MANUCHEHR KHOSHBIN, a.k.a. Manny Khoshbin ("Respondent"), is informed and alleges as follows:

1. Unless otherwise noted, all references to the "Code" are to the California Business and Professions Code, all references to the "Real Estate Law" are to Part 1 of Division 4 of the Code, and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

[1] 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.

STATEMENT OF FACTS

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

3. On or about March 18, 1997, the Department issued a real estate broker license to Respondent, License ID 01146432. Unless renewed, Respondent's real estate broker license shall expire on June 21, 2029. Respondent has renewal rights pursuant to Code section 10201. The Department retains jurisdiction pursuant to Code section 10103.

4. From approximately September 24, 1992, through March 17, 1997, Respondent was previously licensed as a real estate salesperson.

Prior Discipline (H-38117 LA)

5. On May 8, 2012, the Department filed an Accusation against Respondent in Department Case No. H-38117 LA.

6. On July 8, 2013, the Department filed a First Amended Accusation in Case No. H-38117 LA. The First Amended Accusation alleged cause to discipline Respondent's real estate broker license based on alleged trust fund handling violations.

7. On or about December 23, 2013, the parties entered into a Stipulation and Agreement ("Stipulation") to resolve the matter in Case No. H-38117 LA.

8. According to the Stipulation, Respondent's real estate license was subject to discipline pursuant to Code section 10177, subdivision (d), for violation of Code section 10145, Code section 10159.5, Regulation 2831, and Regulation 2731. Respondent's real estate license was suspended for sixty (60) days with said suspension stayed, according to certain terms and conditions as specified in the Stipulation.

9. The Stipulation in Case No. H-38117 LA became effective on January 23, 2014.

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10. On June 10, 2014, Respondent's real estate license was released from the stayed suspension in Case No. H-38117 LA.

2025 Conviction

11. On or about July 24, 2025, before the United States District Court, Central District of California, in Case No. SACR 25-00026-FWS, Respondent pled guilty to, and was convicted of, violating one count of Title 26 United States Code Section 7203 (willful failure to pay tax), a Class A Misdemeanor pursuant to the plea agreement.

12. As part of his sentence, Respondent was placed on probation for two (2) years under certain terms and conditions and ordered to pay restitution in the total amount of $1,380,932 to the Internal Revenue Service and a fine of $25,000 to the United States.

CAUSE OF ACCUSATION

13. The Respondent's conviction on July 24, 2025, as alleged above in Paragraph 11, and the underlying circumstances surrounding said conviction, bear a substantial relationship to the qualifications, functions or duties of a real estate licensee under Regulation 2910.

14. Respondent's July 24, 2025, conviction, as alleged above in Paragraph 11, constitutes cause for the suspension or revocation of all licenses and license rights of Respondent pursuant to Code sections 490 and 10177, subdivision (b).

COST RECOVERY

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

Dated Sep 10, 2026 at Los Angeles, California.

[redacted]

RAY DAGNINO
Supervising Special Investigator

cc: Manuchehr Khoshbin
Ray Dagnino
Sacto.