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FILED

JUL 27 2017

BUREAU OF REAL ESTATE

By B. Nicholas

8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)
12) NO. H-3127 FR
13 TONY ISSAC ALAHVERDI,)
14 Respondent.) ACCUSATION

15 The Complainant, BRENDA SMITH, acting in her official capacity as a
16 Supervising Special Investigator of the State of California, for this Accusation against TONY
17 ISSAC ALAHVERDI ("Respondent"), is informed and alleges as follows:

18 1

19 Respondent is presently licensed and/or has license rights under the Real Estate
20 Law, Part 1 of Division 4 of the Business and Professions Code ("the Code") as a real estate
21 broker.

22 CRIMINAL CONVICTION

23 2

24 On or about April 12, 2017, in the Superior Court of the State of California,
25 County of Tuolumne, Case No. CRF52344, Respondent was convicted of violating Section
26 245(a)(1) of the California Penal Code (assault with a deadly weapon), a misdemeanor and a
27 crime that bears a substantial relationship to the qualifications, functions or duties of a real estate

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

6 

7 BRENDA SMITH
8 Supervising Special Investigator

9 Dated at Fresno, California,
10 this 24 day of July, 2017.

11
12 DISCOVERY DEMAND

13 Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the
14 Department hereby makes demand for discovery pursuant to the guidelines set forth in the
15 *Administrative Procedure Act*. Failure to provide Discovery to the Department may result in the
16 exclusion of witnesses and documents at the hearing or other sanctions that the Office of
17 Administrative Hearings deems appropriate.