

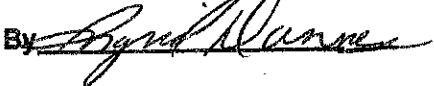
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FILED

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BUREAU OF REAL ESTATE

By 

8 **BEFORE THE BUREAU OF REAL ESTATE**
9 **STATE OF CALIFORNIA**

10 * * *

11 In the Matter of the Application of) No. H-40036 LA
12)
13 DAVID JOHN MOUSSIGHI,) STATEMENT OF ISSUES
14)
15 Respondent.) Mortgage Loan Originator
16) License Endorsement
17)

17 The Complainant, Chika Sunquist, a Supervising Special Investigator of the State
18 of California, for cause of Statement of Issues against DAVID JOHN MOUSSIGHI, a.k.a. David
19 Moussighi, ("Respondent") is informed and alleges as follows:

20 1.

21 The Complainant, Chika Sunquist, a Supervising Special Investigator of the State
22 of California, makes this Statement of Issues against Respondent in her official capacity.

23 2.

24 Respondent is licensed and/or has license rights under the Real Estate Law, Part 1
25 of Division 4 of the Business and Professions Code ("Code"), BRE license ID 01462959.
26 Respondent was first licensed by the Department (now "Bureau") of Real Estate ("BRE" or
27

28 CalBRE Statement of Issues – David John Moussighi

1 “Bureau”) as a real estate salesperson on or about January 6, 2004. Respondent is licensed under
2 employing broker Omid Naimi, BRE license ID 01924368.
3

4 JUDGMENTS AGAINST RESPONDENT

5 3.

6 On or about February 3, 2014, in the Superior Court of the State of California,
7 County of Los Angeles, Northwest District – Small Claims Division, in Case No.
8 LAV 13V09087, Nazareth vs. Moussighi, the court entered a judgment in the amount of
9 \$1,000.00 principal, plus \$50.00 costs, against Respondent based on a complaint that alleged
10 fraud and breach of contract, wherein the Plaintiff alleged that he purchased a vehicle from the
11 defendant, but subsequently discovered that the odometer had been altered to read 100,000 miles
12 less than the actual mileage. On or about February 28, 2014, Respondent filed an appeal in the
13 Superior Court of the State of California, County of Los Angeles, in Case No. 13V09087; on or
14 about March 28, 2014, the court entered a judgment after trial de novo on appeal from the small
15 claims court and entered a judgment in the amount of \$1,600.00 principal, plus \$50.00 costs,
16 against Respondent. There is no evidence regarding Respondent’s satisfaction of this judgment.
17

18 4.

19 On or about July 10, 2013, in the Superior Court of the State of California,
20 County of Los Angeles, Northwest District – Small Claims Division, in Case No.
21 13V03147, Helo and Aguilar vs. Moeir Moussighi and David Moussighi, the court entered a
22 judgment in the amount of \$1,000.00 principal, plus \$124.00 costs, against Respondent and his
23 co-defendant based on a complaint that alleged fraud and breach of contract wherein the
24 Plaintiffs alleged that they paid \$1,000.00 to Respondent and his co-defendant as deposit for the
25 purchase of a vehicle and that Respondent and his co-defendant subsequently failed to produce
26 the vehicle or a refund of the deposit money. There is no evidence regarding Respondent’s
27 satisfaction of this judgment.
28

1 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
2 of this Statement of Issues, and that upon proof thereof, a decision be rendered that the
3 Commissioner refuse to authorize the issuance of, and deny the issuance of, a mortgage loan
4 originator license endorsement to Respondent DAVID JOHN MOUSSIGHI, and for such other
5 and further relief as may be proper under the provisions of law.
6

7 Dated at Sacramento, California
8 this 16th day of November, 2015.
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12 
13 Chika Sunquist
14 Deputy Real Estate Commissioner
15

16
17 cc: David John Moussighi
18 Omid Naimi
19 Chika Sunquist
20 Sacto.
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