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**FILED**

DEC 17 2012

JAMES DEMUS, Counsel (SBN 225005)  
Department of Real Estate  
320 West Fourth St., #350  
Los Angeles, CA 90013

DEPARTMENT OF REAL ESTATE  
BY: Jamir B. Alon

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BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of )  
INLAND INVESTMENTS GROUP INC, dba )  
Inland Empire Realtors, SOUTHLAND )  
INVESTMENTS CORP, dba Southland )  
Real Estate and NAVEED AHMED )  
ZUBERI, individually and as )  
designated officer of Inland )  
Investments Group Inc and )  
Southland Investments Corp, )  
Respondents. )

No. H-04436 SD

A C C U S A T I O N

The Complainant, Veronica Kilpatrick, a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against INLAND INVESTMENTS GROUP INC., alleges as follows:

I

The Complainant, Veronica Kilpatrick, acting in her official capacity as a Deputy Real Estate Commissioner of the State of California, makes this Accusation against INLAND

1 INVESTMENTS GROUP INC, SOUTHLAND INVESTMENTS CORP and NAVEED  
2 AHMED ZUBERI.

3 II

4 At all times mentioned, INLAND INVESTMENTS GROUP INC  
5 ("INLAND") was licensed and/or has license rights issued by the  
6 Department of Real Estate ("Department") as a corporate real  
7 estate broker. INLAND was originally licensed as a corporate  
8 real estate broker on December 22, 2006.

9 III

10 At all times mentioned, SOUTHLAND INVESTMENTS CORP  
11 ("SOUTHLAND") was licensed and/or has license rights issued by  
12 the Department as a corporate real estate broker. SOUTHLAND was  
13 originally licensed as a corporate real estate broker on  
14 September 15, 2005.

15 IV

16 At all times mentioned, NAVEED AHMED ZUBERI ("ZUBERI")  
17 was licensed and/or had license rights issued by the Department  
18 as a real estate broker. ZUBERI was originally licensed as a  
19 real estate broker on August 16, 2004.

20 V

21 From December 22, 2006, through the present, INLAND has  
22 been licensed by the Department as a corporate real estate broker  
23 by and through ZUBERI, as the designated officer and broker  
24 responsible, pursuant to Code Section 10159.2 for supervising the  
25 activities requiring a real estate license conducted on behalf of  
26 INLAND, or by INLAND's officers, agents and employees.

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1 VI

2 From September 15, 2005, through the present, SOUTHLAND  
3 has been licensed by the Department as a corporate real estate  
4 broker by and through ZUBERI, as the designated officer and  
5 broker responsible, pursuant to Code Section 10159.2 for  
6 supervising the activities requiring a real estate license  
7 conducted on behalf of SOUTHLAND, or by SOUTHLAND's officers,  
8 agents and employees.

9 VII

10 First Cause for Accusation

11 (Substantial Misrepresentation)

12 On or about June 23, 2010, escrow closed on Qazi M's  
13 purchase of real property, located at 2102 Brighton Circle,  
14 Covina, CA. INLAND represented the seller in this transaction  
15 and SOUTHLAND represented the buyer. Neither INLAND nor  
16 SOUTHLAND, nor any of their employees, ever disclosed to Qazi M.  
17 that ZUBERI was the designated officer of both corporations.  
18 During the course of this transaction, Qazi M. only dealt with  
19 Moriz Siddqui, an unlicensed employee of INLAND.

20 VIII

21 On or about April 27, 2010, ZUBERI signed a Residential  
22 Purchase Agreement and Joint Escrow Instructions on behalf of the  
23 selling firm (INLAND), for the property described above. This  
24 document also purported to be signed by "Siti Sabari" on behalf  
25 of the listing firm (SOUTHLAND) on April 26, 2010. Although Siti  
26 Sabari was licensed under SOUTHLAND at this time, she never  
27 performed a real estate transaction for SOUTHLAND and denies

1 signing the Residential Purchase agreement described above, or  
2 having any involvement with the Qazi M. transaction.

3 IX

4 As both the designated officer for SOUTHLAND and the  
5 representative for INLAND in the Qazi M. transaction, ZUBERI  
6 knew, or reasonably should have known, if Siti Sabari represented  
7 Qazi M. in this transaction. By signing a Residential Purchase  
8 Agreement with false statements, INLAND, SOUTHLAND and ZUBERI  
9 made substantial misrepresentations and engaged in dishonest  
10 dealing, in violation of Code Sections 10176(a) and 10176(i).  
11 This subjects the real estate licenses and license rights of  
12 INLAND, SOUTHLAND and ZUBERI to suspension or revocation pursuant  
13 to Sections 10176(a), 10176(i), 10177(d) and/or 10177(g) of the  
14 Code.

15 X

16 Second Cause for Accusation

17 (Failure to Retain Documents)

18 On August 30, 2012, SOUTHLAND and ZUBERI were  
19 personally served with a subpoena duces tecum alleging sufficient  
20 cause to require Respondents to produce for inspection and  
21 copying all sales logs and transactional files opened and/or  
22 closed by SOUTHLAND and ZUBERI, including, but not limited to, a  
23 property located at 1218 D Street Corona, CA.

24 XI

25 In response to this subpoena duces tecum, SOUTHLAND and  
26 ZUBERI stated that they could not locate the documentation from  
27 this transaction.

1 XII

2 The conduct, acts or omissions of SOUTLAND and ZUBERI,  
3 as described in paragraphs X and XI above, is in violation of  
4 Code Section 10148 and subjects their real estate licenses and  
5 license rights to suspension or revocation pursuant to Sections  
6 10177(d) and/or 10177(g) of the Code.

7 XIII

8 Code Section 10106, provides, in pertinent part, that  
9 in any order issued in resolution of a disciplinary proceeding  
10 before the Department, the Commissioner may request the  
11 administrative law judge to direct a licensee found to have  
12 committed a violation of this part to pay a sum not to exceed the  
13 reasonable costs of the investigation and enforcement of the  
14 case.

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1                   WHEREFORE, Complainant prays that a hearing be  
2 conducted on the allegations of this Accusation and that upon  
3 proof thereof, a decision be rendered imposing disciplinary  
4 action against all the licenses and license rights under the Real  
5 Estate Law of Respondents INLAND INVESTMENTS GROUP INC.,  
6 SOUTHLAND INVESTMENTS CORP and NAVEED AHMED ZUBERI for the cost  
7 of investigation and enforcement as permitted by law, and for  
8 such other and further relief as may be proper under other  
9 applicable provisions of law.

10  
11 Dated at San Diego, California  
12 this 12 day of December, 2012.

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15 VERONICA KILPATRICK  
16 Deputy Real Estate Commissioner  
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24 cc: INLAND INVESTMENTS GROUP INC.  
25 SOUTHLAND INVESTMENTS CORP  
26 NAVEED AHMED ZUBERI  
27 Veronica Kilpatrick  
Sacto.