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facto

1 Bureau of Real Estate
320 West 4th Street, Suite 350
2 Los Angeles, California 90013-1105

FILED

SEP 16 2013

BUREAU OF REAL ESTATE

By James B. Allen

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4 (213) 576-6910
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8 BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

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12 In the Matter of the Accusation of)

BRE No: H-04436 SD
OAH No: 2013010729

13 INLAND INVESTMENTS GROUP INC, dba)
Inland Empire Realtors, SOUTHLAND)
14 INVESTMENTS CORP, dba Southland)
Real Estate and NAVEED AHMED)
15 ZUBERI, individually and as)
designated officer of Inland)
16 Investments Group Inc and)
Southland Investments Corp,)

STIPULATION AND
AGREEMENT

17)
18 Respondents.)

19 It is hereby stipulated by and between Respondents
20 INLAND INVESTMENTS GROUP INC and NAVEED AHMED ZUBERI, represented
21 by David W. Duke, Esq., and the Complainant, acting by and
22 through James A. Demus, Counsel for the Bureau of Real Estate, as
23 follows for the purpose of settling and disposing of the
24 Accusation filed on December 17, 2012, in this matter:

25 1. All issues which were to be contested and all
26 evidence which was to be presented by Complainant and Respondents
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1 at a formal hearing on the Accusation, which hearing was to be
2 held in accordance with the provisions of the Administrative
3 Procedure Act ("APA"), shall instead and in place thereof be
4 submitted solely on the basis of the provisions of this
5 Stipulation and Agreement ("Stipulation").

6 2. Respondents have received, read and understand the
7 Statement to Respondent, the Discovery Provisions of the APA and
8 the Accusation filed by the Bureau of Real Estate in this
9 proceeding.

10 3. Respondents timely filed a Notice of Defense
11 pursuant to Section 11506 of the Government Code for the purpose
12 of requesting a hearing on the allegations in the Accusation.
13 Respondents hereby freely and voluntarily withdraw said Notice of
14 Defense. Respondents acknowledge that they understand that by
15 withdrawing said Notice of Defense they thereby waive the right
16 to require the Commissioner to prove the allegations in the
17 Accusation at a contested hearing held in accordance with the
18 provisions of the APA and that they will waive other rights
19 afforded to them in connection with the hearing such as the right
20 to present evidence in their defense of the allegations in the
21 Accusation and the right to cross-examine witnesses.

22 4. This Stipulation is based on the factual
23 allegations contained in the Accusation. In the interest of
24 expedience and economy, Respondents choose not to contest these
25 allegations, but to remain silent and understand that, as a
26 result thereof, these factual allegations, without being admitted
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1 or denied, will serve as a prima facie basis for the disciplinary
2 action stipulated to herein. The Real Estate Commissioner shall
3 not be required to provide further evidence to prove said factual
4 allegations.

5 5. This Stipulation is made for the purpose of
6 reaching an agreed disposition of this proceeding and is
7 expressly limited to this proceeding and any other proceeding or
8 case in which the Bureau of Real Estate ("Bureau"), the state or
9 federal government, or any agency of this state, another state or
10 federal government is a party.

11 6. It is understood by the parties that the Real
12 Estate Commissioner may adopt this Stipulation as his Decision in
13 this matter thereby imposing the penalty and sanctions on
14 Respondents' real estate licenses and license rights as set forth
15 in the "Order" herein below. In the event that the Commissioner
16 in his discretion does not adopt the Stipulation, it shall be
17 void and of no effect and Respondents shall retain the right to a
18 hearing and proceeding on the Accusation under the provisions of
19 the APA and shall not be bound by any stipulation or waiver made
20 herein.

21 7. The Order or any subsequent Order of the Real
22 Estate Commissioner made pursuant to this Stipulation shall not
23 constitute an estoppel, merger or bar to any further
24 administrative or civil proceedings by the Bureau of Real Estate
25 with respect to any matters which were not specifically alleged
26 to be causes for Accusation in this proceeding but do constitute
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1 a bar, estoppel and merger as to any allegations actually
2 contained in the Accusation against Respondents herein.

3 DETERMINATION OF ISSUES

4 By reason of the foregoing, it is stipulated and agreed
5 that the following determination of issues shall be made:

6 I.

7 The conduct of INLAND INVESTMENTS GROUP INC and NAVEED
8 AHMED ZUBERI, as described in Paragraph 4, hereinabove, provides
9 a basis for discipline of their licenses and license rights
10 pursuant to Business and Professions Code Section 10176(a).

11 ORDER

12 WHEREFORE, THE FOLLOWING ORDER is hereby made:

13 I.

14 A.

15 All licenses and licensing rights of Respondent INLAND
16 INVESTMENTS GROUP INC under the Real Estate Law are suspended for
17 a period of forty-five (45) days from the effective date of this
18 Decision; provided however, that if INLAND INVESTMENTS GROUP INC
19 petitions, thirty (30) days of said suspension shall be stayed
20 upon condition that:

21 1. Respondent pays a monetary penalty pursuant to
22 Section 10175.2 of the Code at the rate of \$50 for each day of
23 the stayed suspension for a total monetary penalty of \$1,500.

24 2. Said payment shall be in the form of a cashier's
25 check or certified check made payable to the Recovery Account of
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1 the Real Estate Fund. Said check must be received by the Bureau
2 prior to the effective date of the Decision in this matter.

3 2. No further cause for disciplinary action against
4 the real estate license of Respondent occurs within two years
5 from the effective date of the Decision in this matter.

6 3. If Respondent fails to pay the monetary penalty in
7 accordance with the terms and conditions of the Decision, the
8 Commissioner may, without a hearing, order the immediate
9 execution of all or any part of the stayed suspension in which
10 event the Respondent shall not be entitled to any repayment nor
11 credit, prorated or otherwise, for money paid to the Bureau under
12 the terms of this Decision.

13 4. If Respondent pays the monetary penalty and if no
14 further cause for disciplinary action against the real estate
15 license of Respondent occurs within two years from the effective
16 date of the Decision, the stay hereby granted shall become
17 permanent.

18 B.

19 Pursuant to California Business and Professions Code
20 Section 10106, Respondent INLAND INVESTMENTS GROUP INC shall pay
21 the Commissioner's reasonable cost for investigation and
22 enforcement of the matter. The investigation and enforcement
23 cost which led to this disciplinary action is \$3,275.85. Said
24 payment shall be made within sixty (60) days after the effective
25 date of this Decision.

1 provided for herein, or as provided for in a subsequent agreement
2 between the Respondents and the Commissioner. The suspension
3 shall remain in effect until payment is made in full or until a
4 Respondent enters into an agreement satisfactory to the
5 Commissioner to provide for payment, or until a decision
6 providing otherwise is adopted following a hearing held pursuant
7 to this condition.

8 C.

9 Respondent NAVEED AHMED ZUBERI shall within six (6)
10 months from the effective date of the Decision herein, take and
11 pass the Professional Responsibility Examination administered by
12 the Department including the payment of the appropriate
13 examination fee. If Respondent fails to satisfy this condition,
14 the Commissioner may order suspension of Respondent's license
15 until Respondent passes the examination.

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18 DATED: 7/19/13

James A. Demus
19 JAMES A. DEMUS, Counsel for
20 the Bureau of Real Estate

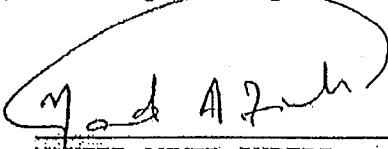
21 EXECUTION OF THE STIPULATION

22 I have read the Stipulation and discussed it with my
23 counsel. Its terms are understood by me and are agreeable and
24 acceptable to me. I understand that I am waiving rights given to
25 me by the California Administrative Procedure Act (including but
26 not limited to Sections 11506, 11508, 11509 and 11513 of the
27 Government Code), and I willingly, intelligently and voluntarily

1 waive those rights, including the right of requiring the
2 Commissioner to prove the allegations in the Accusation at a
3 hearing at which I would have the right to cross-examine
4 witnesses against me and to present evidence in defense and
5 mitigation of the charges.

6 Respondents can signify acceptance and approval of the
7 terms and conditions of this Stipulation by faxing a copy of its
8 signature page, as actually signed by Respondents, to the Bureau
9 at the following telephone/fax number: James A. Demus at (213)
10 576-6917. Respondents agree, acknowledge and understand that by
11 electronically sending to the Bureau a fax copy of Respondent's
12 actual signature as it appears on the Stipulation, that receipt
13 of the faxed copy by the Bureau shall be as binding on Respondent
14 as if the Bureau had received the original signed Stipulation.
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17 DATED: 07/18/2013



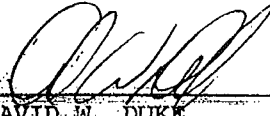
NAVEED AHMED ZUBERI, as Designated
Officer of INLAND INVESTMENTS GROUP
INC

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21 DATED: 07/18/2013



NAVEED AHMED ZUBERI, Respondent

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23
24 DATED: 7/18/2013



DAVID W. DUKE
Attorney for Respondents

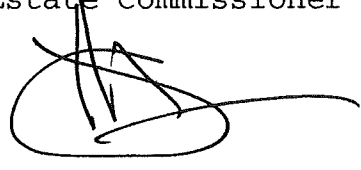
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The foregoing Stipulation and Agreement is hereby
adopted as my Decision as to Respondents INLAND INVESTMENTS GROUP
INC and NAVEED AHMED ZUBERI and shall become effective at 12
o'clock noon on OCT 7 2013, 2013.

IT IS SO ORDERED August 7, 2013.

Real Estate Commissioner



By: _____

By: JEFFREY MASON
Chief Deputy Commissioner