


✓
Linda Fly

1 DIANE LEE, Counsel (SBN 247222)
Bureau of Real Estate
2 320 West 4th Street, Suite 350
3 Los Angeles, California 90013
4 Telephone: (213) 576-6982
(Direct) (213) 576-6907
5
6
7

FILED

FEB 14 2014

BUREAU OF REAL ESTATE

By 

8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of) No. H-04584 SD
12 MARK S. FARHOOD,) A C C U S A T I O N
13 Respondent.)
14 _____)

15 The Complainant, Veronica Kilpatrick, a Deputy Real
16 Estate Commissioner of the State of California for cause of
17 Accusation against MARK S. FARHOOD aka Mark Samad Farhood aka
18 Richard Marcus Vaughn aka Mark Farley aka Allen Garfield
19 ("Respondent") alleges as follows:

20 1.

21 The Complainant, Veronica Kilpatrick, a Deputy Real
22 Estate Commissioner of the State of California, makes this
23 Accusation in her official capacity.

24 2.

25 Respondent is presently licensed and/or has license
26 rights under the Real Estate Law, Part 1 of Division 4 of the
27

1 California Business and Professions Code as a real estate
2 broker.

3
4 (CRIMINAL CONVICTION)

5 3.

6 On or about September 13, 2013, in the United States
7 District Court, Eastern District of Virginia, case no.
8 1:13CR00096-001, Respondent was convicted of violating 18 U.S.C.
9 section 1349 (conspiracy to commit mail, wire, and bank fraud),
10 a felony. This crime is substantially related to the
11 qualifications, functions, or duties of a real estate licensee
12 under Section 2910, Title 10, Chapter 6, California Code of
13 Regulations.

14 4.

15 The crimes of which Respondent was convicted, as
16 described above, constitute cause under California Business and
17 Professions Code sections 490 and 10177(b) for the suspension or
18 revocation of the license and license rights of Respondent under
19 the Real Estate Law.

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

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

Dated at San Diego, California: Dec 9th, 2013.



Veronica Kilpatrick
Deputy Real Estate Commissioner

cc: MARK S. FARHOOD
Veronica Kilpatrick
Sacto.