

FILED

MAR 04 2016

BUREAU OF REAL ESTATE

By R dew

MARY F. CLARKE, Counsel (SBN 186744)
Bureau of Real Estate
1651 Exposition Blvd.
P. O. Box 137007
Sacramento, CA 95813-7007

Telephone: (916) 263-8670
-or- (916) 263-7303 (Direct)
(916) 263-3767 (Fax)

BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

*** * ***

In the Matter of the Accusation of)
)
)
WILLIE WAHEED HAIDARI,)
)
Respondents.)
_____)

NO. H-6368 SAC

ACCUSATION

The Complainant, TRICIA PARKHURST, a Supervising Special Investigator of the State of California, makes this Accusation in her official capacity against WILLIE WAHEED HAIDARI (herein "Respondent"), is informed and alleges as follows:

1

Respondent is licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code (herein "the Code").

2

At all times herein mentioned, Respondent was licensed by the Bureau of Real Estate (herein "the Bureau") as a real estate broker.

///

///

///

At all times herein mentioned, Respondent engaged in the business of, acted in the capacity of, advertised, or assumed to act as real estate broker for compensation or in expectation of compensation within the State of California within the meaning of Section 10131(a) of the Code, whereby Respondent sold or offered to sell, bought or offered to buy, solicited prospective sellers or purchasers of, solicited or obtained listings of, or negotiated the purchase, sale or exchange of real property or a business opportunity.

On about June 25, 2013, in connection with the activities described in Paragraph 3, above, Respondent, on behalf of purchaser Abdul Malik J. (Abdul), whom he represented in the purchase of a property located on Dierkes Road in Sacramento, CA (herein "Dierkes Property"), caused a copy of Check #461 (herein "Check #461") to be submitted into escrow with Orange Coast Title Company of Northern California, showing the amount of about \$10,000, as an earnest money deposit for the purchase of the Dierkes Property.

Check #461 was ostensibly written against Abdul's checking account at Bank of America (herein "BoA") and was ostensibly signed by Abdul; however, Abdul did not have an account with BoA, did not write and did not sign Check #461. In fact, Respondent altered one of his own BoA checks, Check #461, to show Abdul's name at the top, but obliterated Abdul's address, as well as the bank routing and checking account numbers at the bottom of the check, caused it to be signed and submitted a copy of it with the purchase offer on the Dierkes Property, in violation of Sections 10176(a) and (i) and/or 10177(j) or (g) of the Code.

On about November 9, 2013, in connection with the activities described in Paragraph 3, above, Respondent, on behalf of purchaser Abdul, whom he represented in the purchase of a property located on Sutherland Way in Elk Grove, CA, (herein "Sutherland Way Property"), re-altered Check #461, described in paragraphs 5 and 6, and again caused a copy of it

1 to be submitted into escrow, this time with LSI Title Company, Inc., showing the amount of
2 about \$5,000, as an earnest money deposit for the purchase of the Sutherland Way Property.

3 7

4 Check #461, ostensibly written against Abdul's checking account at BoA was
5 again ostensibly signed by Abdul; however, Abdul did not have an account with BoA, did not
6 write and did not sign Check #461. In fact, Respondent re-altered his own BoA check, Check
7 #461, once again showing Abdul's name at the top, but obliterating Abdul's address, as well as
8 the checking account number at the bottom of the check, caused it to be signed and submitted a
9 copy of it with the purchase offer on the Sutherland Way Property, in violation of Sections
10 10176(a) and (i) and/or 10177(j) or (g) of the Code.

11 8

12 The facts alleged above are grounds for the suspension or revocation of the
13 licenses and license rights of Respondent under Sections 10176(a) and (i) and/or 10177(j) or (g)
14 of the Code.

15 COST RECOVERY

16 9

17 Investigation and Enforcement Costs

18 Section 10106 of the Code provides, in pertinent part, that in any order issued in
19 resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the
20 Administrative Law Judge to direct a licensee found to have committed a violation of this part to
21 pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

22 ///

23 ///

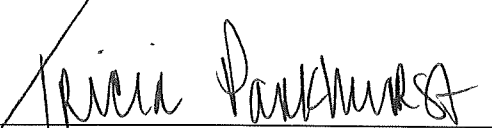
24 ///

25 ///

26 ///

27 ///

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 (Part 1 of
4 Division 4 of the Business and Professions Code), for the cost of the investigation and
5 enforcement as permitted by law, and for such other and further relief as may be proper under
6 other applicable provisions of law.

7
8 
9 TRICIA PARKHURST
10 Supervising Special Investigator

11
12 Dated at Sacramento, California,
13 this 22nd day of February, 2016.
14
15
16
17
18
19
20
21
22
23
24
25
26
27