

FILED

OCT 28 2022

DEPARTMENT OF REAL ESTATE

By *Ag deed*

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8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Application of)	
)	NO. H-7169 SAC
12 SHAFIQA SHAFIQ KAKAR EHSAN,)	
)	<u>STATEMENT OF ISSUES</u>
13 Respondent.)	
14)	

15 The Complainant, RUTH CORRAL, a Supervising Special Investigator of the
16 State of California, for Statement of Issues in her official capacity against SHAFIQA SHAFIQ
17 KAKAR EHSAN (Respondent), is informed and alleges as follows:

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19 Respondent is presently licensed and/or has license rights under the Real Estate
20 Law, Part 1 of Division 4 of the California Business and Professions Code (Code) by the
21 Department of Real Estate (Department) as a real estate salesperson.

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23 On or about May 13, 2022, Respondent made application to the Department
24 through the Nationwide Mortgage Licensing System and Registry for an individual mortgage
25 loan originator endorsement (individual license endorsement).

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On or about October 20, 2003, in the Superior Court of California, County of Santa Clara, Case No. CC304292, Respondent was convicted of violating Section 484/487 (b)(3) of the California Penal Code (Grand Theft by Employee, Agent, or Servant) with an enhancement per Section 12022.6 (a)(1) of the Penal Code. Respondent's conviction, a felony and crime, involved an act of fraud and/or dishonesty.

The facts alleged in paragraph 3, above, constitutes cause for denial of Respondent's application for an individual license endorsement pursuant to Sections 10166.05 (b) (Felony Conviction Involving Fraud/Dishonesty), 10166.05 (c) (Financial Responsibility, Character, and General Fitness), 10166.051 (b) (Failure to Meet Requirements Pursuant to Sections 10166.05 of the Code) of the Code, and Sections 2758.3 (Evidence of Financial Responsibility) and 2945.3 (Felony Conviction Involving Fraud/Dishonesty) of Title 10, Chapter 6, California Code of Regulations.

WHEREFORE, the Complainant prays that the above-entitled matter be set for hearing and, upon proof of the charges contained herein, that the Real Estate Commissioner refuse to authorize the issuance of, and deny the issuance of, a mortgage loan originator endorsement to Respondent, and for such other and further relief as may be proper under applicable provisions of law.


RUTH CORRAL
Supervising Special Investigator

Dated at Sacramento, California,
this 12th day of September 2022.

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DISCOVERY DEMAND

Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the Department hereby makes demand for discovery pursuant to the guidelines set forth in the *Administrative Procedure Act*. Failure to provide Discovery to the Department may result in the exclusion of witnesses and documents at the hearing or other sanctions that the Office of Administrative Hearings deems appropriate.