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FILED

SEP 23 2024

DEPT. OF REAL ESTATE

By _____

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

11 In the Matter of the Accusation of
12 NICK ROSHDIEH,
13 Respondent.

No. H-42952-LA

FIRST AMENDED ACCUSATION

14 **This First Amended Accusation amends the Accusation filed on July 29, 2024.** The
15 Accusation filed on July 29, 2024 ("original Accusation"), is amended to correct a typo in
16 Paragraph 3, and to remove the allegations in Paragraphs 8 and 9, under the Second Cause of
17 Accusation, that Respondent NICK ROSHDIEH failed to report in writing his September 1, 2023
18 conviction within thirty (30) days of the date of the conviction. No other parts of the original
19 Accusation are affected.

20 The Complainant, Jason Parson, a Supervising Special Investigator for the Department of
21 Real Estate ("Department" or "DRE") of the State of California, for cause of Accusation against
22 NICK ROSHDIEH, also known as Nick A. Roshpieh, Nick A. Roshier, Nick Ali Orshdieh, Nick
23 A. Roshdiem, Ali Roshdieh, and Nick Ali Roshdieh ("Respondent"), is informed and alleges in his
24 official capacity as follows:

25 1. The Complainant, Jason Parson, acting in his official capacity as a Supervising
26 Special Investigator, makes this Accusation against Respondent.

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FIRST AMENDED ACCUSATION

2. Respondent presently has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code ("Code"), as a real estate salesperson ("RES") (DRE license identification number 01339587).

FIRST CAUSE OF ACCUSATION

(CRIMINAL CONVICTION)

3. On or about September 1, 2023, in the United States District Court for the Central District of California, in the case of *United States v. Nick Roshdieh, et al.*, Case No. SACR 21-00221-JLS-1, Respondent was convicted based on his guilty plea for violations of Title 18 of the United States Code ("U.S.C."), sections 371 (conspiracy (Count 1)) and 220(a)(2) (illegal remunerations for referral to clinical treatment facilities (Count 5)), both of which are felonies. The court sentenced Respondent to be committed to the custody of the Federal Bureau of Prisons to be imprisoned for a term of 18 months on each count, to be served concurrently, and ordered that Respondent pay a special assessment of \$200.00 and a fine of \$15,000.00, and that upon release from imprisonment, Respondent be placed on supervised release for a term of three (3) years subject to terms and conditions including but not limited to: not working for, owning, or otherwise receiving revenues from any addiction treatment facility, sober living home, urinalysis facility, or any business otherwise providing addiction treatment; not being employed by, affiliated with, owning, controlling, volunteering for, or otherwise participating, directly or indirectly, in any business involving federally funded or state funded health insurance or entitlement programs without the express written approval of the Probation Officer prior to engaging in such employment; and reporting this conviction to the California Department of Real Estate.

4. The conviction, as described in Paragraph 3 above, bears a substantial relationship under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications, functions, or duties of a real estate licensee.

5. The crime for which Respondent was convicted, as described in Paragraph 3 above, constitutes cause under Code sections 490 and 10177(b) for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

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6. The Complainant realleges and incorporates by reference all of the allegations contained in paragraphs 1 through 5 above, with the same force and effect as though fully set forth herein.

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1 WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this
2 Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against
3 all the licenses and license rights of Respondent NICK ROSHDIEH under the Real Estate Law, for
4 the costs of investigation and enforcement as permitted by law, and for such other and further relief
5 as may be proper under other applicable provisions of law.

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7 Dated 09/23/2024, at Los Angeles, California.

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10 _____
11 Jason Parson
12 Supervising Special Investigator

13 cc: NICK ROSHDIEH
14 Real Estate of the Pacific Inc.
15 Jason Parson
16 Sacto.
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