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**FILED**

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BUREAU OF REAL ESTATE

By John Cepik

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7  
8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of ) CalBRE No. H-39162 LA  
12 ANDREW LAWRENCE PARTIDA, ) A C C U S A T I O N  
13 Respondent. )  
14

15 The Complainant, Veronica Kilpatrick, a Deputy Real Estate  
16 Commissioner of the State of California, for cause of Accusation  
17 against ANDREW LAWRENCE PARTIDA ("Respondent"), is informed and  
18 alleges as follows:

19 1.

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

22 2.

23 From August 2, 1985, through the present, Respondent has  
24 been licensed and/or has license rights by the Bureau of Real

1 Estate ("Bureau") as a real estate salesperson, License ID  
2 00893363. At all times relevant herein, Respondent was licensed  
3 under the employment of broker Christopher Karl Baumann.

4 3.

5 All references to the "Code" are to the California Business  
6 and Professions Code and all references to "Regulations" are to  
7 Title 10, Chapter 6, California Code of Regulations.

8 4.

9 On or about August 3, 2012, Respondent procured a listing  
10 agreement for a condominium located in the City of Beaumont. On  
11 September 16, 2012, a purchase agreement was secured for the  
12 subject property. Escrow was opened on September 24, 2012. The  
13 prospective purchaser's lender required that the homeowner's  
14 association ("HOA") complete and sign a certification in order  
15 to underwrite the mortgage loan. On or about September 27,  
16 2012, the HOA's authorized agent Deb G. forwarded a  
17 certification bearing her signature to the escrow company.

18 5.

19 Thereafter, the purchaser changed lenders and the HOA agent  
20 Deb G. was asked to update or verify information on a HOA  
21 certification. On or about October 25, 2012, the HOA agent  
22 discovered that her signature had been forged on two separate  
23 HOA certifications that had been submitted to escrow or the  
24

1 purchaser's new lender. Respondent forged, or caused to have,  
2 Deb G.'s signature forged on the falsified HOA certifications.

3 6.

4 Pursuant to Code section 10176, subdivision (i), the  
5 Real Estate Commissioner may suspend or revoke a real  
6 estate licensee where the licensee has been guilty of any  
7 conduct which constitutes fraud or dishonest dealing.

8 7.

9 The conduct, acts and/or omissions of Respondent as set  
10 forth above in Paragraph 5 constitute cause for the suspension  
11 or revocation of the license and license rights of Respondent  
12 ANDREW LAWRENCE PARTIDA pursuant to Code Sections 10176,  
13 subdivision (i); 10177, subdivision (d) (violation of the Real  
14 Estate Law); and/or 10177, subdivision (g) (negligence).

15 8.

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

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