

MARY F. CLARKE, Counsel (SBN 186744)
Department of Real Estate
P. O. Box 187007
Sacramento, CA 95818-7007

Telephone: (916) 227-0789
-or- (916) 227-0780 (Direct)
-or- (916) 227-9458 (Fax)

FILED

JUN 17 2011

DEPARTMENT OF REAL ESTATE

By K. Contreras

BEFORE THE
DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of	)	
	)	NO. H-2642 FR
GEOFFREY RAY GREENE,	)	
	)	<u>ACCUSATION</u>
Respondent.	)	
	)	

The Complainant, LUKE MARTIN, a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against GEOFFREY GREENE (herein "Respondent"), is informed and alleges as follows:

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The Complainant makes this Accusation in his official capacity.

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

3

At all times herein mentioned, Respondent was and now is licensed by the State of California Department of Real Estate as a real estate broker, employed by Guarantee Real

1 Estate (herein "Guarantee") from about November 17, 1997 to about March 10, 2010, and was
2 doing business under the fictitious business names of "Geoffrey Greene and Associates," and
3 "Geoffrey Greene Team" in the State of California.

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5 At all times herein mentioned, Respondent engaged in the business of, acted in
6 the capacity of, advertised, or assumed to act as a real estate broker within the State of California
7 within the meaning of Section 10131(a) of the Code, including the operation and conduct of a
8 resale brokerage with the public wherein, on behalf of others, for compensation or in expectation
9 of compensation, Respondent sold and offered to sell, bought and offered to buy, solicited
10 prospective sellers and purchasers of, solicited and obtain listings of, and negotiated the purchase
11 and sale of real property.

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13 In about August 2003, Respondent filed a fictitious business name for Kavanagh
14 Marketing Associates (herein "Kavanagh") with the County of Fresno, an entity solely owned
15 and operated by Respondent, for the purpose of receiving referral fees from Guarantee, in the
16 amount of about 25 percent of gross commissions from Respondent's sales activities as an
17 employee of Guarantee, outside of Guarantee and Respondent's commission fee structure,
18 without the knowledge and/or consent of Guarantee.

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20 Between about August 2003 and January 2010, Respondent through Kavanagh
21 received referral fees from Guarantee, in the amount of about \$282,740.68, in violation of
22 Section 10176(g) and (i) of the Code.

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24 The facts alleged above are grounds for the suspension or revocation of the
25 license and license rights of Respondent under Section 10176(g) and (i) of the Code.

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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 the license and license rights of Respondent under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code) and for such other and further relief as may be proper under other applicable provisions of law.

LUKE MARTIN
Deputy Real Estate Commissioner

Dated at Fresno, California
this 26th day of May, 2011.