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**FILED**

MAR 13 2017

BUREAU OF REAL ESTATE

By B. Nicholas

9 BEFORE THE BUREAU OF REAL ESTATE

10 STATE OF CALIFORNIA

11 \* \* \*

12 In the Matter of the Accusation of: )  
13 SHEILA EVONNE GREEN, ) NO. H- 6513 SAC  
14 Respondent. ) ACCUSATION

15 The Complainant, THOMAS CAMERON, a Supervising Auditor II of the State  
16 of California, makes this Accusation in his official capacity against SHEILA EVONNE GREEN  
17 (“Respondent”), and is informed and alleges as follows:

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

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23 At all times herein mentioned, Respondent conducted real estate activity under  
24 her individual broker license and the fictitious business name “Catalyst Property Management  
25 Solutions,” registered with the Bureau.

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At all times mentioned, Respondent engaged in the business of, acted in the capacity of, advertised, or assumed to act as a real estate broker within the State of California within the meaning of section 10131(b) of the Code, including the operation and conduct of a property management business with the public wherein, on behalf of others, for compensation or in expectation of compensation, Respondent leased or rented and offered to lease or rent, and solicited for prospective tenants of real property or improvements thereon, and collected rents from real property or improvements thereon.

While acting as a real estate licensee as described in Paragraph 3, Respondent accepted or received funds in trust (trust funds) from or on behalf of owners and tenants in connection with the leasing, renting, and collection of rents on real property or improvements thereon, as alleged herein, and thereafter from time-to-time made disbursements of said trust funds.

The trust funds accepted or received by Respondent, as described in Paragraph 4, were deposited or caused to be deposited by Respondent into a trust account maintained by Respondent for the handling of trust funds, and thereafter, from time-to-time, Respondent made disbursements of said trust funds, identified as follows:

TRUST ACCOUNT # 1	
Bank Name and Location:	Wells Fargo 5120 Laguna Boulevard Elk Grove, California 95758
Account No.:	XXXXXX9519
Entitled:	Catalyst Property Mgmt Solutions Trust Account
Signatories:	Sheila Green (REB)
No. of Signatures Required:	One

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Beginning on or about April 12, 2016, and continuing intermittently through June 24, 2016, an audit was conducted of Respondent's records. The auditor herein examined the records for the period of January 1, 2015, through February 29, 2016.

In the course of the activities described in Paragraph 3, Respondent:

(a) caused, suffered or permitted the balance of funds in Trust Account #1 to contain a shortage of \$44,295.57 without the prior written consent of each and every owner of such funds, in violation of section 10145 of the Code and section 2832.1 of title 10, California Code of Regulations ("Regulations");

(b) failed to maintain accurate written control record of all trust funds received and disbursed from Trust Account #1 in violation of section 10145 of the Code and section 2831 of the Regulations; and

(c) failed to accurately reconcile at least once a month, the balance of all separate beneficiary or transaction records with the balance of the control records for Trust Account #1 in violation of section 10145 of the Code and section 2831.2 of the Regulations.

The acts and/or omissions of Respondent, as alleged above in Paragraph 7, constitute grounds for the suspension or revocation of all licenses and license rights of Respondent pursuant to the following provisions of the Code and Regulations:

As to Paragraph 7(a), under section 10177(d) and/or 10177(g) of the Code, in conjunction with section 10145 of the Code and section 2832.1 of the Regulations;

As to Paragraph 7(b), under section 10177(d) and/or 10177(g) of the Code, in conjunction with section 10145 of the Code and section 2831 of the Regulations; and

As to Paragraph 7(c), under section 10177(d) and/or 10177(g) of the Code, in conjunction with section 10145 of the Code and section 2831.2 of the Regulations;

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1 COST RECOVERY

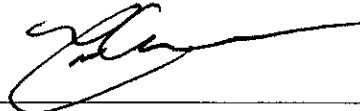
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3 The acts and/or omissions of Respondent, as alleged above, entitle the Bureau to  
4 reimbursement of the costs of its audit pursuant to section 10148(b) of the Code.

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

10 WHEREFORE, Complainant prays that a hearing be conducted on the allegations  
11 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary  
12 action against all licenses and license rights of Respondent under the Code, for the cost of the  
13 audit, investigation, and enforcement as permitted by law, and for such other and further relief as  
14 may be proper under other provisions of law.

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17 THOMAS CAMERON  
18 Supervising Auditor II

19 Dated at Sacramento, California,  
20 this 7<sup>th</sup> day of March, 2017

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22 DISCOVERY DEMAND

23 Pursuant to sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the  
24 Bureau of Real Estate hereby makes demand for discovery pursuant to the guidelines set forth in  
25 the *Administrative Procedure Act*. Failure to provide Discovery to the Bureau of Real Estate  
26 may result in the exclusion of witnesses and documents at the hearing or other sanctions that the  
27 Office of Administrative Hearings deems appropriate.