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FILED

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DEPARTMENT OF REAL ESTATE

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BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)

No. H-38039 LA

A C C U S A T I O N

EBJ FINANCIAL)
ENTERPRISES, INC.;)
and EUSTACIO BARRERA JORGE)
individually and as)
designated officer of)
EBJ Financial Enterprises, Inc.)

Respondents,)

The Complainant, Robin Trujillo, a Deputy Real Estate
Commissioner of the State of California, for cause of accusation
against EBJ FINANCIAL ENTERPRISES, INC. and EUSTACIO BARRERA
JORGE individually and as designated officer of EBJ Financial
Enterprises, Inc., alleges as follows:

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1 1. The Complainant, Robin Trujillo, acting in her
2 official capacity as a Deputy Real Estate Commissioner of the
3 State of California, makes this Accusation against EBJ FINANCIAL
4 ENTERPRISES, INC., and EUSTACIO BARRERA JORGE.

5 2. EBJ FINANCIAL ENTERPRISES, INC., and EUSTACIO
6 BARRERA JORGE individually and as designated officer of EBJ
7 Financial Enterprises, Inc. (hereinafter referred to as
8 "Respondents") are presently licensed and/or have license rights
9 under the Real Estate Law (Part 1 of Division 4 of the Business
10 and Professions Code, hereinafter Code).

11 3. Respondent EBJ FINANCIAL ENTERPRISES, INC. was
12 licensed as a real estate broker on or about March 3, 2000.
13 23886 KILLION ST., WOODLAND HILLS

14 4. On or about January 5, 2010, for or in expectation
15 of compensation, Respondents solicited an earnest money deposit
16 from Mehrdad N. G. to purchase real property located at 23886
17 Killion St., Woodland Hills, California.

18 5. Respondents violated Code Section 10145 and
19 Regulation 2832 by not depositing the funds totaling around
20 \$15,000 into a real estate broker trust account.

21 6. Respondents misappropriated the funds they received
22 from the buyer without the knowledge or permission of the buyer.
23 10604 LOUISE AVE., GRANADA HILLS

24 7. During 2010, for or in expectation of compensation,
25 Respondents solicited an earnest money deposit from Jacqueline M.
26 M. and Evelyn M. M. to purchase real property located at 10604
27 Louise Ave., Granada Hills, California.

1 8. Respondents violated Code Section 10145 and
2 Regulation 2832 by not depositing the funds totaling around
3 \$50,000 into a real estate broker trust account.

4 9. Respondents misappropriated the funds they received
5 from the buyers without the knowledge or permission of the
6 buyers.

7 24048 CALVERT ST., WOODLAND HILLS AND 7715 DUCOR AVENUE, WEST
8 HILLS

9 10. In or around October, 2009, for or in expectation
10 of compensation, Respondents solicited earnest money deposits and
11 additional funds to payoff lienholder from Samir A. D. to
12 purchase real properties located at 24048 Calvert St., Woodland
13 Hills, California and 7715 Ducor Avenue, West Hills, California.

14 11. Respondents violated Code Section 10145(a) and
15 Regulation 2832 by not depositing the funds totaling around
16 \$65,000 into a real estate broker trust account.

17 12. Respondents misappropriated the funds they received
18 from the buyer without the knowledge or permission of the buyer.

19 CAUSE FOR DISCIPLINE

20 13. The conduct of Respondents, as alleged above,
21 subjects their real estate licenses and license rights to
22 suspension or revocation pursuant to Section 10176(i) of the
23 Business and Professions Code, and Sections 10177(d) and/or
24 10177(g) for violation of Code Section 10145, and Regulation
25 2832.

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1 COST RECOVERY

2 Code Section 10106 provides, in pertinent part, that in
3 any order issued in resolution of a disciplinary proceeding
4 before the department, the commissioner may request the
5 administrative law judge to direct a licensee found to have
6 committed a violation of this part to pay a sum not to exceed the
7 reasonable costs of the investigation and enforcement of the
8 case.

9 WHEREFORE, Complainant prays that a hearing be
10 conducted on the allegations of this Accusation and that upon
11 proof thereof, a decision be rendered imposing disciplinary
12 action against all licenses and license rights of Respondents EBJ
13 FINANCIAL ENTERPRISES, INC., and ESTACIO BARRERA JORGEE
14 individually and as designated officer of EBJ Financial
15 Enterprises, Inc. under the Real Estate Law (Part 1 of Division 4
16 of the Business and Professions Code), for the cost of
17 investigation and enforcement as permitted by law, and for such
18 other and further relief as may be proper under other applicable
19 provisions of law.

20 Dated at Los Angeles, California

21 this 9 day of April, 2012.

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23 ROBIN TRUJILLO
24 Deputy Real Estate Commissioner

25 cc: EBJ Financial Enterprises, Inc.
26 Eustacio Barrera Jorge
27 Robin Trujillo
Sacto.