1 2	JUDITH B. VASAN, Counsel (SBN 278115) Bureau of Real Estate 320 West 4th Street, Suite 350
3	Los Angeles, California 90013-1105 Telephone: (213) 576-6982 (Direct) (213) 576-6904
4	FEB 0 9 2016 BUREAU OF REAL ESTATE
5	By John Cognil
7	
8	BEFORE THE BUREAU OF REAL ESTATE
9	STATE OF CALIFORNIA
10	* * *
11	In the Matter of the Accusation of) No. H-40135 LA
12	M2000 GROUP, INC and JOSE-LUIS PENA ESPINOZA, individually and as) ACCUSATION O O O O O O O O O O O O
14	designated officer of M2000 Group, Inc,
15	Respondents.
16	
17	The Complainant, Maria Suarez, a Supervising Special Investigator of the State
18	of California, for cause of Accusation against M2000 GROUP, INC and JOSE-LUIS PENA
19	ESPINOZA. ("Respondents"), alleges as follows:
20	1.
21	The Complainant, Maria Suarez, a Supervising Special Investigator of the State
	of California, makes this Accusation in her official capacity.
23	2.
24	Respondent M2000 GROUP, INC ("M2000") is presently licensed and/or has
25	license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and
26	
27	i a contraction of the contracti

ACCUSATION OF M2000 GROUP, INC AND JOSE-LUIS PENA ESPINOZA

Professions Code ("Code"), as a corporate real estate broker. Respondent M2000 was initially 1 2 licensed as a corporate real estate broker on December 4, 2003. Respondent M2000's license 3 expired on December 4, 2015. The Bureau of Real Estate retains jurisdiction over the lapsed license, pursuant to Code Section 10103. 5 3. 6 Respondent JOSE-LUIS PENA ESPINOZA ("ESPINOZA") is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the Code. as a real estate broker. He is presently the designated officer for M2000. 9 **FIRST CAUSE OF ACCUSATION** 10 (SUSPENSION OF CORPORATE RIGHTS) 11 4. 12 On or about October 9, 2003, the Articles of Incorporation of Respondent M2000 were filed with the Secretary of the State of California. 13 14 5. 15 On or about May 1, 2009, the California Franchise Tax Board suspended Respondent M2000's powers, rights and privileges pursuant to the provisions of the California 17 Revenue and Taxation Code, and they remain suspended to date. 18 6. 19 The suspension of the corporate powers, rights, and privileges of Respondent 20 M2000, as alleged above, are in violation of Title 10, Chapter 6 of the California Code of 21 Regulations Section 2742(c), and subjects its real estate license and license rights to suspension 22 or revocation pursuant to Code Sections 10177(d), 10177(f), and/or 10177(g). 23 /// 24 /// 25 /// 26 /// 27

SECOND CAUSE OF ACCUSATION

(FAILURE TO SUPERVISE)

7.

The conduct, acts or omissions of Respondent ESPINOZA, in allowing Respondent M2000 to violate the Real Estate Law, as alleged above, constitutes a failure by Respondent ESPINOZA, as the officer designated by the corporate broker licensee, to exercise the supervision and control of the activities conducted on behalf of Respondent M2000 by its officers and employees as required by Code Section 10159.2, and is cause to suspend or revoke the real estate license and license rights of Respondent ESPINOZA pursuant to Code Sections 10177(d) and/or 10177(g) and 10177(h).

8.

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

17 | ///

1

2

3

4

5

6

9

10

11

12

13

14

15

16

18 | | ///

19 | | ///

0 ||//

21 | | ///

22 | | ///

23 | | ///

24 | | ///

25 11/

26 | | ///

27

ACCUSATION OF M2000 GROUP, INC AND JOSE-LUIS PENA ESPINOZA

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 all the licenses and license rights of Respondents M2000 GROUP, INC and JOSE-LUIS PENA ESPINOZA under the Real Estate Law for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law. б Dated at Los Angeles, California Supervising Special Investigator cc: M2000 GROUP, INC

cc: M2000 GROUP, INC
JOSE-LUIS PENA ESPINOZA
Maria Suarez
Sacto.