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FILED
MAR 15 2016
BUREAU OF REAL ESTATE
By *[Signature]*

BEFORE THE BUREAU OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of) No. H-40168 LA
)
JACQUELINE CONTRERAS,) ACCUSATION
)
)
Respondent.)

The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California, for cause of Accusation against JACQUELINE CONTRERAS ("Respondent") is informed and alleges as follows:

1.

The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California, makes this Accusation in her official capacity.

2.

Respondent is presently licensed and/or has license rights under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code, hereinafter "Code") as a real estate salesperson.

1 3.

2 Respondent does not now and never has held a mortgage loan originator
3 endorsement to her real estate salesperson license.

4 4.

5 At the time of the events alleged herein Respondent was employed by
6 Homeworks Group Inc., a licensed real estate broker. Homeworks Group Inc. had no prior
7 knowledge of the facts set forth below.

8 5.

9 At all times herein mentioned, Respondent, acting through JC Financial
10 Consulting, Inc. ("JC Financial"), engaged in the business of, acted in the capacity of, or
11 advertised a loan modification service and advance fee brokerage offering to perform and
12 performing loan modification and negotiation services with respect to loans which were
13 secured by liens on real property for compensation or in expectation of compensation and for
14 fees collected in advance.

15 6.

16 At no time mentioned herein was JC Financial licensed by the Bureau of Real
17 Estate ("Bureau") in any capacity.

18 7.

19 In or around September, 2013, consumer Greg I. ("Consumer") consulted with
20 Respondent about obtaining a loan modification of the mortgage loan on his property located at
21 15769 Silverpointe Avenue, Chino Hills, California. Respondent represented to Consumer that
22 she could negotiate a reduction in his monthly mortgage payment to \$1,800, including
23 principal, interest and taxes. Consumer thereafter entered into an agreement with Respondent
24 whereby Respondent agreed to provide loan modification and related foreclosure avoidance
25 services in exchange for the payment of an advance fee in the amount of \$4,500. On or about
26 October 9, 2013, Consumer made an advance fee payment of \$2,250 to JC Financial on behalf
27 of Respondent. Consumer made an additional advance fee payment to JC Financial on behalf of

1 Respondent in the amount of \$2,270 on or about November 19, 2013. Despite the foregoing,
2 Respondent failed to obtain the mortgage payment reduction promised to Consumer. Further,
3 Respondent failed to refund any portion of the advance fee paid by Consumer other than a
4 single refund payment in the amount of \$250, which Respondent made on or about November
5 18, 2014.

6 8.

7 The activities described in Paragraphs 5 and 7, above, require that Respondent
8 have a real estate broker license under Code Sections 10131(d) [soliciting borrowers or lenders
9 or negotiating loans] and 10131.2 [advance fee handling], and, additionally, that Respondent
10 obtain the issuance of a mortgage loan origination endorsement in compliance with the
11 provisions of Code Section 10166.02(b)(2).

12 9.

13 Respondent performed and/or participated in mortgage loan
14 modification/foreclosure avoidance, solicitation, and negotiation activities which require a real
15 estate broker license and a mortgage loan origination endorsement when Respondent was not
16 licensed by the Bureau as a real estate broker nor employed as a real estate salesperson by the
17 broker on whose behalf the activities were performed .

18 10.

19 The conduct, acts and/or omissions of Respondent, as set forth, above, violates
20 Code Sections 10130 and 10166.02(b)(2), and is cause for the suspension or revocation of the
21 licenses and license rights of Respondent pursuant to Code Sections 10177(d) and/or 10177(g).

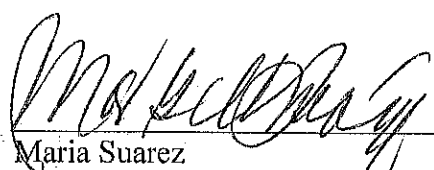
22 Code Section 10106 provides, in pertinent part, that in any order issued in
23 resolution of a disciplinary proceeding before the Bureau of Real Estate, the Commissioner
24 may request the administrative law judge to direct a licensee found to have committed a
25 violation of this part to pay a sum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

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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 all the licenses and license rights of Respondent JACQUELINE CONTRERAS under the Real Estate Law, for the cost of investigation and enforcement as permitted by Code Section 10106, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California
this 12th day of February, 2016.



Maria Suarez
Supervising Special Investigator

cc: JACQUELINE CONTRERAS
Maria Suarez
Sacto.