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FILED

AUG 11 2016

BUREAU OF REAL ESTATE

By *Carol Selvaris*

8
9 BEFORE THE BUREAU OF REAL ESTATE

10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-40343 LA
13)
14 LUZ YOLANDA GREENEMEIER,) A C C U S A T I O N
15) Respondent.)

16 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
17 of California, for cause of Accusation against LUZ YOLANDA GREENEMEIER, a.k.a. LUZ
18 YOLANDA GREENMEIER, a.k.a. LUZ YOLANDA GREENEMEIER, a.k.a. LUZ
19 YOLANDA ISAZA ZARATE, a.k.a. LUZ YOLANDA ISAZA ("Respondent"), is informed
20 and alleges as follows:

21 1.

22 The Complainant, Maria Suarez, acting in her official capacity as a Supervising
23 Special Investigator of the State of California, makes this Accusation against LUZ YOLANDA
24 GREENEMEIER.

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Accusation of Luz Yolanda Greenemeier

1 2.

2 A Plus Financial Services Inc, doing business as A Plus Realtors and Green
3 Home Funding, presently has license rights under the Real Estate Law, Part 1 of Division 4 of
4 the California Business and Professions Code ("Code"), as a corporate real estate broker.

5 3.

6 Respondent presently has license rights under the Real Estate Law as a
7 designated officer of A Plus Financial Services Inc. Respondent also has a mortgage loan
8 originator license endorsement.

9 FIRST CAUSE OF ACTION

10 (CRIMINAL CONVICTIONS)

11 4.

12 On or about August 28, 2013, Respondent pled guilty and was convicted in the
13 Superior Court of California, County of Orange, Case No. 13NM03083, for violation of
14 California Penal Code Section 602(k) (Trespass), a misdemeanor. Respondent was placed on
15 three years of informal probation, and ordered to pay fines and fees.

16 5.

17 On or about January 12, 2016, Respondent pled guilty and was convicted in the
18 Superior Court of California, County of Orange, Case No. 15NM11365, for violation of
19 California Penal Code Section 484(a)-488 (Petty Theft), a misdemeanor. Respondent was
20 placed on three years of informal probation, and ordered to pay fines and fees.

21 6.

22 The convictions described in Paragraphs 4 and 5 bear a substantial relationship
23 under Section 2910, Title 10, Chapter 6, California Code of Regulations to the qualifications,
24 functions or duties of a real estate licensee.

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1 7.

2 The crimes of which Respondent was convicted, as described in Paragraphs 4
3 and 5 above, constitute cause under Sections 490 and 10177(b) of the Code for the suspension
4 or revocation of all the licenses and license rights of Respondent under the Real Estate Law.

5 SECOND CAUSE OF ACTION

6 (FAILURE TO REVEAL CONVICTION ON LICENSE RENEWAL APPLICATION)

7 8.

8 On or about April 2, 2015, Respondent certified and submitted her Officer
9 Renewal Application. In response to Question 17, under the Background Information section
10 of her license renewal application, to wit, "WITHIN THE SIX-YEAR PERIOD PRIOR TO
11 FILING THIS APPLICATION, HAVE YOU EVER BEEN CONVICTED (SEE
12 PARAGRAPH ABOVE) OF ANY VIOLATION OF THE LAW AT THE MISDEMEANOR
13 OR FELONY LEVEL? IF YES, COMPLETE ITEM 23 WITH INFORMATION ON EACH
14 CONVICTION", Respondent answered "NO," and failed to disclose the conviction described
15 in Paragraph 4 above.

16 9.

17 Respondent's failure to reveal this conviction, as set forth in Paragraph 4 above,
18 in her license renewal application constitutes procurement of a real estate license renewal by
19 fraud, misrepresentation, or deceit, or by making a false statement of material fact required to
20 be revealed in said application, and constitutes cause under Section 10177(a) of the Code for
21 the suspension or revocation of all the licenses and license rights of Respondent under the Real
22 Estate Law.

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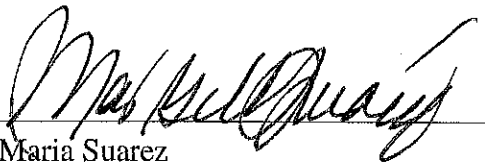
10.

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 the investigation and enforcement of the case.

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 LUZ YOLANDA GREENEMEIER 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.

Dated at Los Angeles, California

this 10th day of August, 20 16.


Maria Suarez
Supervising Special Investigator

cc: LUZ YOLANDA GREENEMEIER
A Plus Financial Services Inc DBA A Plus Realtors and Green Home Funding
Maria Suarez
Sacto.

Accusation of Luz Yolanda Greenemeier