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FILED

MAY 27 2025



9 DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation against) No. H-43076 LA
13 HUBERTO VILLANUEVA LOPEZ) ACCUSATION
14 and)
15 GABRIEL MATIAS LIMON,)
16 Respondents.)
17)

18 The Complainant, Ray Dagnino, a Supervising Special Investigator of the State of
19 California, makes this Accusation in her official capacity, and for cause of Accusation against
20 Respondents HUBERTO VILLANUEVA LOPEZ a.k.a. Humberto Lopez (LOPEZ); and
21 GABRIEL MATIAS LIMON (LIMON) (collectively, "Respondents"), is informed and alleges
22 as follows:

23 1.

24 All references to the "Code" are to the California Business and Professions Code
25 and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

26 DRE Accusation against Humberto Villanueva Lopez and Gabriel Matias Limon, H-43076 LA
27

1 **DRE LICENSE HISTORY**

2 2.

3 **HUMBERTO VILLANUEVA LOPEZ**

4 According to Department of Real Estate (DRE) records to date and publicly
5 accessible online (https://www2.dre.ca.gov/PublicASP/pplinfo.asp?License_id=01400409),
6 HUMBERTO VILLANUEVA LOPEZ (LOPEZ) is presently licensed and/or has license rights
7 under the Real Estate Law as a real estate broker (REB), DRE license ID 01400409. LOPEZ was
8 originally licensed by the DRE on or about October 2, 2003 as a real estate salesperson (RES) and
9 on or about March 15, 2013 as a REB. LOPEZ' mailing and main address of record is 8077
10 Florence Avenue, #204, Downey, CA 90240 (Downey address) and his license is presently not
11 affiliated with any DBAs or branch offices. LOPEZ' license is not presently affiliated with any
12 licensed corporations.

13 3.

14 According to DRE records to date and publicly accessible at the aforementioned
15 DRE webpage described in Paragraph 2, Respondent was previously the designated officer of
16 record for SARINANA INC. until his affiliation was cancelled on August 20, 2014. Respondent
17 was also a broker associate for SARINANA INC. from September 7, 2022 to August 1, 2024.

18 4.

19 According to DRE records to date and publicly accessible online at the
20 aforementioned DRE webpage described in Paragraph 2, LOPEZ' license will expire on April 6,
21 2029. Upon license expiration and pursuant to Code Section 10201, LOPEZ retains renewal
22 rights, and pursuant to Code Section 10103, the DRE retains jurisdiction.

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1 5.

2 GABRIEL MATIAS LIMON

3 According to Department of Real Estate (DRE) records to date and publicly
4 accessible online (https://www2.dre.ca.gov/PublicASP/pplinfo.asp?License_id=02010769),
5 GABRIEL MATIAS LIMON (LIMON) is presently licensed and/or has license rights under the
6 Real Estate Law as a real estate salesperson (RES), DRE license ID 02010769. LIMON was
7 originally licensed by the DRE on or about August 13, 2016. LIMON's mailing and main
8 address of record is 12822 Foxley Dr., Whittier, CA 90602 and his license is presently affiliated
9 with DAVID SARINANA as his responsible REB of record.

10 6.

11 According to DRE records to date and publicly accessible at the aforementioned
12 DRE webpage described in Paragraph 5, LIMON's previous responsible REB affiliations were
13 with DAVID SARINANA from August 2, 2024 to August 12, 2024, and with SARINANA INC
14 from August 16, 2016 to May 23, 2024.

15 7.

16 According to DRE records to date and publicly accessible online at the
17 aforementioned DRE webpage described in Paragraph 5, LIMON's license will expire on August
18 27, 2028. Upon license expiration and pursuant to Code Section 10201, LIMON retains renewal
19 rights, and pursuant to Code Section 10103, the DRE retains jurisdiction.

20 8.

21 Sarinana Inc

22 According to Department of Real Estate (DRE) records to date and publicly
23 accessible online (https://www2.dre.ca.gov/PublicASP/pplinfo.asp?License_id=01206776),
24 Sarinana Inc (Sarinana) is presently licensed and/or has license rights under the Real Estate Law
25 as a restricted real estate corporation (RREC), DRE license ID 01206776. Sarinana was

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1 originally licensed by the DRE on or about May 24, 1996. Sarinana's mailing and main address
2 of record is the same as LOPEZ' Downey address, as described above in Paragraph 2. David
3 Sarinana is Sarinana's designated officer of record (D.O.).

4 9.

5 According to DRE records to date and publicly accessible at the aforementioned
6 DRE webpage described in Paragraph 8, Sarinana has affiliated with its license 55 RES and one
7 (1) DBA, for Century 21 A Better Service Realty, active as of January 15, 2025 (and previously
8 active from May 24, 1996 to May 24, 2024).

9 10.

10 According to DRE records to date and publicly accessible online at the
11 aforementioned DRE webpage described in Paragraph 8, Sarinana's license will expire on
12 January 14, 2029. Upon license expiration and pursuant to Code Section 10201, Sarinan retains
13 renewal rights, and pursuant to Code Section 10103, the DRE retains jurisdiction.

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11.

According to DRE records to date and publicly accessible online at the
aforementioned DRE webpage described in Paragraph 8, Sarinana's license has a history of
discipline, listed on said webpage as follows:

"12/02/04 - H-31548 LA

09/09/05 - SUSPENDED --FOR 90 DAYS--STAYED FOR 2 YEARS

09/09/05 - H-31548 LA RELEASED

09/09/05 - OFFICER SARINANA SUSPENDED FOR 90 DAYS--STAYED
FOR 2 YEARS

11/06/17 - H-40847 LA FOR CORP AND OFFICER SARINANA

10/30/18 - SUSPENDED 30 DAYS--STAYED FOR 2 YEARS ON TERMS
AND CONDITIONS

10/30/18 - FOR OFFICER SARINANA SUSPENDED 30 DAYS--STAYED
FOR 2 YEARS ON TERMS AND CONDITIONS

05/08/20 - H-41659 LA FOR CORP & OFFICER Sarinana

06/30/21 - H-41659 LA RELEASED

06/30/21 - SUSPENDED 90 DAYS--STAYED FOR 3 YEARS ON TERMS
AND CONDITIONS

06/30/21 - FOR OFFICER SARINANA SUSPENDED 90 DAYS--STAYED
3 YEARS ON TERMS AND CONDITIONS

04/03/24 - H-42813 LA FOR CORP AND OFFICER SARINANA

01/15/25 - REVOKED-RIGHT TO RESTRICTED LICENSE PER H-42813 LA

01/15/25 - FOR OFFICER SARINANA REVOKED--RIGHT TO
RESTRICTED LICENSE PER H-42813 LA"

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12.

According to DRE records to date, on or about January 15, 2025, in DRE Case H-42813 LA, Sarinana’s license was revoked with a right to a restricted license for its violation of Code Section 10137.

13.

David Sarinana

According to Department of Real Estate (DRE) records to date and publicly accessible online (https://www2.dre.ca.gov/publicasp/pplinfo.asp?License_id=00760251), David Sarinana (DSarinana) is presently licensed and/or has license rights under the Real Estate Law as a restricted real estate broker (RREB), DRE license ID 00760251. DSarinana was originally licensed by the DRE on or about March 25, 1984. DSarinana’s mailing and main address of record is the same as Downey address, as described above in Paragraphs 2 and 8, respectively. DSarinana is presently the D.O. of Sarinana.

14.

According to DRE records to date and publicly accessible at the aforementioned DRE webpage described in Paragraph 13, DSarinana has affiliated with its license 40 RES (including LIMON) and one (1) DBA, for Century 21 A Better Service Realty, active as of January 15, 2025 (and previously active from July 5, 1994 to March 23, 2000).

15.

According to DRE records to date and publicly accessible online at the aforementioned DRE webpage described in Paragraph 13, DSarinana’s license will expire on January 14, 2029. Upon license expiration and pursuant to Code Section 10201, DSarinana retains renewal rights, and pursuant to Code Section 10103, the DRE retains jurisdiction.

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16.

According to DRE records to date, DSarinana's license has a history of discipline, listed on said webpage as follows:

- "12/02/04 - H-31548 LA
- 09/09/05 - SUSPENDED --FOR 90 DAYS--STAYED FOR 2 YEARS
- 09/09/05 - H-31548 LA RELEASED
- 11/06/17 - H-40847 LA
- 10/30/18 - SUSPENDED 30 DAYS--STAYED FOR 2 YEARS ON TERMS
AND CONDITIONS
- 05/08/20 - H-41659
- 06/30/21 - H-41659 LA RELEASED
- 06/30/21 - SUSPENDED 90 DAYS--STAYED FOR 3 YEARS ON TERMS
AND CONDITIONS
- 04/03/24 - H-42813 LA
- 01/15/25 - REVOKED-RIGHT TO RESTRICTED LICENSE PER H-42813 LA"

17.

According to DRE records to date, on or about January 15, 2025, in DRE Case H-42813 LA, DSarinana's license was revoked with a right to a restricted license for his violation of Regulation 2725.

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1 18.

2 Unlicensed Awesome Property Management Inc.

3 According to DRE records to date and publicly accessible online
4 (<https://www2.dre.ca.gov/PublicASP/pplinfo.asp>), Awesome Property Management Inc.
5 (APMI) is not licensed by the Department in any capacity and has no license rights under the
6 Real Estate Law (Part 1 of Division 4 of the Code) or any license endorsements attaching to any
7 Department licenses.

8 19.

9 According to certified California Secretary of State (SOS) records (certified on or
10 about February 6, 2024) and publicly accessible online
11 (<https://bizfileonline.sos.ca.gov/search/business>), APMI is a registered corporation, Entity
12 #3776822. APMI filed its Articles of Incorporation on April 13, 2015. According to APMI's
13 August 3, 2022 and July 20, 2023 Statements of Information, its principal, mailing and street
14 address are the same Downey address as that of LOPEZ, Sarinana and DSarinana, as described
15 in Paragraphs 2, 8 and 13, respectively, and LOPEZ is listed as its Chief Executive Officer,
16 Secretary, Chief Financial Officer, [sole] Director, and agent for service of process. APMI's
17 August 3, 2022 Statement of Information lists its type of business as property management.

18 20.

19 According to the aforementioned DRE webpage described in Paragraph 19, APMI
20 is an active corporation in good standing with respect to the Secretary of State and the Franchise
21 Tax Board.

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1 21.

2 Unlicensed Maria Lopez-Villanueva

3 According to DRE records to date and publicly accessible online
4 (<https://www2.dre.ca.gov/PublicASP/ppinfo.asp>), Maria Lopez-Villanueva a.k.a. Cristina
5 Lopez; Cristina-Maria Lopez-Villanueva (Lopez-Villanueva) is not licensed by the Department
6 in any capacity and has no license rights under the Real Estate Law (Part 1 of Division 4 of the
7 Code) or any license endorsements attaching to any Department licenses.

8 22.

9 FACTS DISCOVERED BY THE DEPARTMENT

10 At all times mentioned, in the State of California, Respondents conducted
11 licensed activities within the meaning of Code Section 10131¹ and performed real estate
12 activities, which require a real estate license, including, but not limited to activities performed by
13 his employees, agents and RES. At all times mentioned, in the State of California, unlicensed
14 Lopez-Villanueva and APMI and conducted licensed activities within the meaning of Code
15 Section 10131 and performed real estate sales activities, which require a real estate license, when
16 they were not licensed by the DRE.

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19 _____
20 ¹ Pursuant to Code Section 10131 *Broker Defined*, "A real estate broker within this meaning of this part is a person
21 who, for a compensation or in expectation of a compensation, regardless of the form or time of payment, does or
22 negotiates to do one or more of the following acts for another or others: (a) Sells or offers to sell, buys or offers to
23 buy, solicits prospective sellers or purchasers of, solicits or obtains listings of, or negotiates the purchase, sale or
24 exchange of real property or a business opportunity. (b) Leases or rents or offers to lease or rent, or places for rent,
25 or solicits listings of places for rent, or solicits for prospective tenants, or negotiates the sale, purchase or exchanges
26 of leases on real property, or on a business opportunity, or collects rents from real property, or improvements
thereon, or from business opportunities. (c) Assists or offers to assist in filing an application for the purchase or
lease of, or in locating or entering upon, lands owned by the state or federal government. (d) Solicits borrowers or
lenders for or negotiates loans or collects payments or performs services for borrowers or lenders or note owners in
connection with loans secured directly or collaterally by liens on real property or on a business opportunity. (e) Sells
or offers to sell, buys or offers to buy, or exchanges or offers to exchange a real property sales contract, or a
promissory note secured directly or collaterally by a lien on real property or on a business opportunity, and performs
services for the holders thereof."

1 23.

2 City of Downey Complaint to the DRE

3 On or about April 18, 2023 the City of Downey (California) filed a complaint
4 with the Department on behalf of consumer Jannet S. (Property Owner)(041823 Complaint).
5 According to the 041823 Complaint, the Downey Police Department (Downey P.D.) filed a
6 courtesy report on behalf of the Property Owner, who advised that she contracted with real estate
7 company APMI to manage eleven (11) of her rental properties located in Orange and Los
8 Angeles Counties, and believes the employees of said company converted the rent money on the
9 properties. Attached to the 041823 Complaint was a copy of the underlying courtesy Downey
10 P.D. report

11 24.

12 Downey Police Report

13 According to the Downey P.D. report dated September 14, 2022, the Property
14 Owner identified Lopez-Villanueva, LOPEZ and LIMON and alleged that she and LOPEZ met
15 in August 2018 regarding his company's management of her rental properties located in Buena
16 Park, Bellflower and Los Alamitos. According to the Property Owner, LOPEZ' employees
17 would collect monthly rent payments from her tenants and deposit said payments into her bank
18 account. According to the Property Owner, at this meeting, LOPEZ indicated that his sister
19 Maria Lopez (Lopez-Villanueva) would be in charge of managing the Property Owner's
20 properties/account.

21 25.

22 According to the Downey P.D. report, on or about June 1, 2022, when the
23 Property Owner inquired with her tenant Sarah D. as to why Sarah D. had not made her monthly
24 rent payments, Sarah D. told her that she had in fact made consistent rent payments, sent copies
25

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1 of her rent checks to the Property Owner, and informed that on January 29, 2019, Lopez-
2 Villanueva instructed her (Sarah D.) to make her rent payments to APMI.

3 26.

4 According to the Downey P.D. report, on or about June 12, 2022, when she asked
5 Lopez-Villanueva regarding the accounts, Lopez-Villanueva claimed to have no knowledge. The
6 Property Owner subsequently contacted LOPEZ, who advised that he would research the
7 situation. LOPEZ later contacted the Property Owner to express: his disappointment in Lopez-
8 Villanueva's handling of the Property Owner's account; his lack of knowledge of Lopez-
9 Villanueva's embezzlement of the Property Owner's money; and his intention to return to the
10 Property Owner the missing money.

11 27.

12 According to the Downey P.D. report, on July 3, 2022, the Property Owner
13 contacted LOPEZ and LIMON, both of whom agreed, in approximately two weeks, to return her
14 money and provide her with copies of all the contracts. LOPEZ and LIMON provided to the
15 Property Owner a printout of APMI's bank account, which showed the dates and times that
16 Lopez-Villanueva deposited the rent money in the APMI account (and not that of the Property
17 Owner) and Lopez-Villanueva's withdrawals of said money from the APMI account. LOPEZ
18 and LIMON asserted to the Property Owner that they had no knowledge as to what Lopez-
19 Villanueva did upon withdrawing rent monies from the APMI account.

20 28.

21 APMI Property Management of Subject Properties

22 According to the Property Management Agreement proposal dated and executed
23 on August 13, 2018 between "Awesome Property Management Inc C/O Humberto
24 Lopez/Gabriel Matias" (LOPEZ/LIMON) and the Property Owner, APMI was to provide
25 management services [of properties located on Cedar St. in Bellflower, on Fullerton Ave. in

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1 Buena Park, and on Howard Ave. in Los Alamitos] including, but not limited to: advertising
2 vacancies, screening prospective tenants, “collecting all monthly rents,” addressing tenant
3 concerns, and “deliver/deposit monthly rents to owner’s bank account or mail” for compensation
4 in the amount of \$800.00 per month of all the rents collected.

5 29.

6 A Property Management Agreement (C.A.R. Form PMA, rev. 6/17) dated
7 October 3, 2018 between Awesome Property Management Inc c/o LOPEZ and the Property
8 Owner for property located in Bellflower for compensation in the amount of \$152.00 per month
9 “upon rent collection” was signed on August 13, 2018. A Lease Listing Agreement, Exclusive
10 Authorization to Lease or Rent (C.A.R. Form LL, rev. 6/18) dated August 13, 2018 between
11 Awésome Property Management Inc/C/O LOPEZ and the Property Owner was signed on the
12 same date for the Cedar St.

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1 30.

2 Beginning on or about August 3, 2018, LOPEZ and LIMON operated unlicensed
3 APMI to provide property management services to the Property Owner in exchange for
4 compensation, with unlicensed Lopez-Villanueva in charge of the Property Owner's account,
5 including management of Property Owner's properties located at:

- 6 • ###7 Cedar Avenue, Bellflower, CA 90706
- 7 • ###9 Cedar Avenue, Bellflower, CA 90706
- 8 • ###1 Cedar Avenue, Bellflower, CA 90706
- 9 • ###1 1/2 Cedar Avenue, Bellflower, CA 90706
- 10 • ###2 Howard Avenue, Los Alamitos, CA 90720
- 11 • ###4 Howard Avenue, Los Alamitos, CA 90720
- 12 • ###6 Howard Avenue, Los Alamitos, CA 90720
- 13 • ###2 Fullerton Avenue, Buena Park, CA 90621
- 14 • ###4 Fullerton Avenue, Buena Park, CA 90621
- 15 • ###6 Fullerton Avenue, Buena Park, CA 90621
- 16 • ###8 Fullerton Avenue, Buena Park, CA 90621

17 31.

18 LOPEZ' Acknowledgement of Embezzlement of Trust Funds by APMI Employee

19 According to February 18, 2024 correspondence to the DRE from a legal
20 representative for LOPEZ and LIMON, "...during May of 2022...Mr. Lopez (LOPEZ)
21 determined that an employee of Awesome had in fact embezzled funds from Awesome that
22 should have been remitted to [the Property Owner] in connection with the property located at
23 ###8 Fullerton Avenue. Mr. Lopez (LOPEZ) believed that [the Property Owner] was getting
24 paid as that employee listed the payment as being made to [the Property Owner], even though the
25 actual check was not paid to [the Property Owner]...immediately terminated the employment of

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1 the person involved...Mr. Lopez (LOPEZ) met with [the Property Owner] once he determined
2 the amount of the embezzlement, which was the sum of \$63,650. Mr. Lopez (LOPEZ) did not
3 recover the funds from Awesome's employee but repaid [the Property Owner] the full amount of
4 \$63,650 of which \$55,250 was paid...by July 29, 2022 and the balance of \$8,000 was paid...on
5 August 1, 2022..."

6 32.

7 According to January 17, 2025 correspondence to the DRE from the
8 aforementioned legal representative for LOPEZ and LIMON, since April 17, 2015, APMI has
9 provided real property management services including: tenant screening and placement, tenant
10 screening and placement, marketing vacant properties, lease enforcement and renewals, drafting
11 and signing lease agreements, and assisting each owner with rent collections and rent deposits.

12 33.

13 According to the aforementioned January 17, 2025 correspondence described
14 above in Paragraph 32, between January 2016 and May 2022, Lopez-Villanueva was
15 compensated as, and employed by, APMI as an "administrative assistant," through electronic
16 payments, with job duties such as: correspondence, emails and phone calls, document
17 preparation and presentations, communications assistance, preparation of applications and lease
18 agreements, maintenance coordination, tracking rent payments and updating records, assisting in
19 advertising vacancies, and coordinating showing times with prospective tenants. Included with
20 said correspondence were copies of IRS Form 1099s showing \$43,550 in total compensation
21 paid to Lopez-Villanueva for tax years 2020 and 2021.

22 34.

23 According to the aforementioned January 17, 2025 correspondence described
24 above in Paragraph 32, "Mr. Humberto Villanueva Lopez is operating solely under the DRE
25 license issued to Broker Humberto Lopez, CEO of Awesome Property Management, Inc."

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1 35.

2 According to the aforementioned January 17, 2025 correspondence described
3 above in Paragraph 32, LIMON has, for three to four years, as an independent contractor,
4 provided “consultation services directly to Humberto Lopez Broker/APMI. These services
5 include taking phone calls, setting up appointments, and showing properties, and LIMON works
6 as an independent contractor “providing services to broker Humberto Villanueva Lopez and his
7 company, Awesome Property Management, Inc,” for \$725.00 weekly compensation” via
8 electronic Zelle payments from APMI’s trust account at Bank of America, of which LOPEZ is
9 the sole signatory. According to said correspondence, all transactions are handled by
10 LOPEZ/APMI and LIMON assists.

11 36.

12 Since 2015, APMI has advertised and held itself out to the public as a property
13 management company, both in-person and online through social media.

14 37.

15 LOPEZ’ Century 21 A Better Service Realty business card does not identify his
16 DRE license ID number. According to LOPEZ’ APMI business card, APMI is located at the
17 Downey address described above in Paragraphs 2, 8 and 13, and above he is identified by his
18 DRE (BRE¹) license ID number as the “Managing Broker” of APMI. According to LIMON’s
19 APMI business card bearing the same Downey address, LIMON is identified without any DRE
20 license ID and is listed as a “Listing Agent” of APMI.

21 38.

22 On Facebook (facebook.com/profile.php?id = 100070156235395), APMI lists
23 itself as a property management company located at the Downey address described above in

24
25 ¹ As part of a State of California reorganization plan, the Department of Real Estate (DRE) became the Bureau of
26 Real Estate (BRE or CalBRE) on July 1, 2013. Effective July 1, 2018, the agency was renamed back the
27 Department of Real Estate.

1 Paragraphs 2, 8 and 13 as that of LOPEZ, Sarinana and DSarinana and an email address of
2 humberto21c@gmail.com. According to a February 7, 2024 printout of APMI's Facebook page,
3 it has at least one rental property listing post (from 2019), and there are reviews that date as far
4 back as 2015. A 2018 review commented, "A friend of mine was looking for a lease in the City
5 of Downey and both of them were able to help him with the lease," while a 2015 review noted
6 that APMI is "run by Gilberto and Humberto."

7 39.

8 On Instagram (instagram.com/apm_management_inc/), APMI lists itself, through
9 its profile photo of LOPEZ' business card, identified by his DRE (BRE) license ID as its
10 "Managing Broker," as a property management company located at the Downey address
11 described above in Paragraphs 2, 8 and 13. According to a February 7, 2024 printout of APMI's
12 Instagram page, its display name and username are the same: apm_management_inc, and it has
13 posted at least 42 times, with at least one of said posts being a rental property listing.

14 40.

15 On Instagram (instagram.com/p/C4ZjGifl4Zx/?img_index= 1), LIMON identifies
16 himself as a real estate agent of Century 21 A Better Service Realty located t the Downey
17 address described above in Paragraphs 2, 8 and 13. According to a November 27, 2024 printout
18 of LIMON's Instagram page, there is at least one (1) post that is a rental property listing and
19 includes in the caption his DRE license ID; said post includes at least APMI
20 (apm_management_inc) as a collaborator.

21 41.

22 As recently as January 18, 2025, the Property Owner received a text message
23 solicitation from (562)371-0076 of property management services that included a photo of
24 LOPEZ' APMI business card, as described in Paragraph 32 above, and a message that read,
25

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1 “...looking for hassle-free property management ##### Cedar St? We’ve got your covered! stress
2 [sic] less, and keep tenants happy with our services...”

3 **APPLICABLE SECTIONS OF THE REAL ESTATE LAW**

4 42.

5 **License Required**

6 **(Code Sections 10130 and 10131)**

7 Pursuant to Code Section 10130 *License Required*:

8 “It is unlawful for any person to engage in the business of, act in the capacity of,
9 advertise as, or assume to act as a real estate broker or a real estate salesperson within this state
10 without first obtaining a real estate license from the department, or to engage in the business of,
11 act in the capacity of, advertise as, or assume to act as a mortgage loan originator within this
12 state without having obtained a license endorsement. The commissioner may prefer a complaint
13 for violation of this section before any court of competent jurisdiction, and the commissioner and
14 his or her counsel, deputies, or assistants, may assist in presenting the law or facts at the
15 trial. *Prosecution of Violations*: It is the duty of the district attorney of each county in this state
16 to prosecute all violations of this section in their respective counties in which the violations
17 occur.”

18 43.

19 Pursuant to Code Section 10131 *Broker Defined*:

20 “A real estate broker within this meaning of this part is a person who, for a
21 compensation or in expectation of a compensation, regardless of the form or time of payment,
22 does or negotiates to do one or more of the following acts for another or others:

23 (a) Sells or offers to sell, buys or offers to buy, solicits prospective sellers or
24 purchasers of, solicits or obtains listings of, or negotiates the purchase, sale or
25 exchange of real property or a business opportunity.

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Unlawful Employment or Payment of Compensation – Penalty

(Code Section 10137)

Pursuant to Code Section 10137 *Unlawful Employment or Payment of Compensation – Penalty:*

“It is unlawful for any licensed real estate broker to employ or compensate, directly or indirectly, any person for performing any of the acts within the scope of this chapter who is not a license real estate broker, or a real estate salesperson licensed under the broker employing or compensating him or her, or to employ or compensate, directly or indirectly, any licensee for engaging in any activity for which a mortgage loan originator license endorsement is required, if that licensee does not hold a mortgage loan originator license endorsement; provided, however, that a licensed real estate broker may pay a commission to a broker of another state. No real estate salesperson shall be employed by or accept compensation for activity requiring a real estate license from any person other than the broker under whom he or she is at the time licensed. It is unlawful for any licensed real estate salesperson to pay any compensation for performing any of the acts within the scope of this chapter to any real estate licensee except through the broker under whom he or she is at the time licensed. For a violation of any of the provisions of this section, the commissioner may temporarily suspend or permanently revoke the license of the real estate licensee, in accordance with the provisions of this part relating to hearings.”

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1 45.

2 **Penalties for Payment of Unlawful Compensation**

3 **(Code Section 10138)**

4 Pursuant to Code Section 10138 *Penalties for Payment of Unlawful*
5 *Compensation*

6 “It is a misdemeanor, punishable by a fine of not exceeding one hundred dollars
7 (\$100) for each offense, for any person, whether obligor, escrowholder or otherwise, to pay or
8 deliver to anyone a compensation for performing any of the acts within the scope of this chapter,
9 who is not known to be or who does not present evidence to such payor that he is a regularly
10 licensed real estate broker at the time such compensation is earned. For a violation of any of the
11 provisions of this section, the commissioner may temporarily suspend or permanently revoke the
12 license of the real estate licensee in accordance with the provisions of this part relating to
13 hearings.”

14 46.

15 **False Advertising**

16 **(Code Section 10140)**

17 Pursuant to Code Section 10140 *False Advertising*:

18 “Every officer, agent or employee of any company, and every other person who
19 knowingly authorizes, directs or aids in the publication, advertisement, distribution or
20 circularization of any false statement or representation concerning any land or subdivision
21 thereof, as defined in Chapter 1 (commencing at Section 11000) of Part 2 of this division,
22 offered for sale or lease, or, if the land is owned by the State or Federal Government, which such
23 person offers to assist another or others to file an application for the purchase or lease of, or to
24 locate or enter upon, and every person who, with knowledge that any advertisement, pamphlet,
25 prospectus or letter concerning any said land or subdivision, as defined in Chapter 1

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1 (commencing at Section 11000) of Part 2 of this division, contains any written statement that is
2 false or fraudulent, issues, circulates, publishes or distributes the same, or causes the same to be
3 issued, circulated, published or distributed, or who, in any other respect, willfully violates or fails
4 to comply with any of the provisions of this section, or who in any other respect willfully
5 violates or fails, omits or neglects to obey, observe or comply with any order, permit, decision,
6 demand or requirement of the commissioner under this section, is guilty of a public offense, and
7 shall be punished by a fine not exceeding one thousand dollars (\$1,000), or by imprisonment in a
8 county jail not exceeding one year, or by both such fine and imprisonment, and, if a real estate
9 licensee, he shall be held to trial by the commissioner for a suspension or revocation of his
10 license, as provided in the provisions of this part relating to hearings. The district attorney of
11 each county in this State shall prosecute all violations of the provisions of this section in
12 respective counties in which the violations occur.”

13 47.

14 **Disclosure of Licensed Status in Advertising**

15 **(Code Section 10140.6 and Regulation 2773)**

16 Pursuant to Code Section 10140.4 *Disclosure of Licensed Status in Advertising*:

17 “(a) A real estate licensee shall not publish, circulate, distribute, or cause to be
18 published, circulated, or distributed in any newspaper or periodical, or by mail, any matter
19 pertaining to any activity for which a real estate license is required that does not contain a
20 designation disclosing that he or she is performing acts for which a real estate license is required.

21 (b)(1) A real estate licensee shall disclose his or her name, license identification
22 number and unique identifier assigned to that licensee by the Nationwide Mortgage Licensing
23 System and Registry, if that licensee is a mortgage loan originator, and responsible broker’s
24 identity, as defined in Section 10015.4, on all solicitation materials intended to be the first point
25 of contact with consumers and on real property purchase agreements when acting in a manner

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1 that requires a real estate license or mortgage loan originator license endorsement in those
2 transactions. The commissioner may adopt regulations identifying the materials in which a
3 licensee must disclose a license identification number and unique identifier assigned to that
4 licensee by the Nationwide Mortgage Licensing System and Registry, and responsible broker's
5 identity.

6 (2) For purposes of this section, "solicitation materials" include business
7 cards, stationery, advertising flyers, advertisements on television, in print, or electronic media,
8 "for sale," rent, lease, "open house," and directional signs, and other materials designed to solicit
9 the creation of a professional relationship between the licensee and a consumer.

10 (3) Nothing in this section shall be construed to limit or change the
11 requirement described in Section 10236.4 as applicable to real estate brokers.

12 (c) This section shall not apply to "for sale," rent, lease, "open house," and
13 directional signs that do either of the following:

14 (1) Display the responsible broker's identity, as defined in Section 10015.4,
15 without reference to an associate broker or licensee.

16 (2) Display no license identification information.

17 (d) "Mortgage loan originator," "unique identifier," and "Nationwide Mortgage
18 Licensing System and Registry" have the meanings set forth in Section 10166.01.

19 (e) This section shall become operative on January 1, 2018."

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2 Pursuant to Regulation 2773(a)(1) *Disclosure of License Identification Number on*
3 *Solicitation Materials – First Point of Contact with Consumers:*

4 “(a) A real estate broker or salesperson, when engaging in acts for which a license
5 is required, shall disclose its, his or her eight (8) digit real estate license identification number on
6 all solicitation materials intended to be the first point of contact with consumers. If the name of
7 more than one licensee appears in the solicitation, the license identification number of each
8 licensee shall be disclosed. The license numbers of employing brokers or corporate brokers
9 whose names or logos or trademarks appear on solicitation materials along with the names and
10 license numbers of licensed employees or broker associates do not need to appear on those
11 materials.

12 Solicitation materials intended to be the first point of contact with consumers, and in which a
13 licensee must disclose a license identification number, include the following:

- 14 (1) Business cards;
- 15 (2) Stationery;
- 16 (3) Websites owned, controlled, and/or maintained by the soliciting real estate
17 licensee; and
- 18 (4) Promotional and advertising fliers, brochures, email and regular mail,
19 leaflets, and any marketing or promotional materials designed to solicit the
20 creation of a professional relationship between the licensee and a
21 consumer, or which is intended to incentivize, induce or entice a consumer
22 to contact the licensee about any service for which a license is required.
- 23 (5) Advertisements in electronic media (including, without limitation, internet,
24 email, radio, cinema, and television advertisements, and the opening
25 section of streaming video and audio);

Handling of Trust Funds – Interest-Bearing Accounts – Neutral Escrow Defined

(Code Section 10145)

Pursuant to Code Section 10145 *Handling of Trust Funds* (selected portions):

“(a)(1): A real estate broker who accepts funds belonging to others in connection with a transaction subject to this part shall deposit all those funds that are not immediately placed into a neutral escrow depository or into the hands of the broker’s principal, into a trust fund account maintained by the broker in a bank or recognized depository in this state. All funds deposited by the broker in a trust account shall be maintained there until disbursed by the broker in accordance with instructions from the person entitled to the funds.

(2) Withdrawals may be made from a trust fund account of an individual broker only upon the signature of that broker, or in the case of a corporate broker, only upon the signature of an officer through whom the corporation is licensed pursuant to Section 10158 or 10211, or one, or more, of the following persons if specifically authorized in writing by the individual broker or officer:

(A) A real estate salesperson licensed to the broker.

(B) Another broker acting pursuant to a written agreement with the individual broker that conforms to the requirements of this part and any regulations promulgated pursuant to this part.

(C) An unlicensed employee of the individual broker, if the broker has fidelity bond coverage equal to at least the maximum amount of the trust funds to which the unlicensed employee has access at any time. For purposes of this section, bonds providing coverage may be written with a deductible of up to 5 percent of the coverage amount. For bonds with a deductible, the employing broker shall have evidence of financial

1 responsibility that is sufficient to protect members of the public against a
2 loss subject to the deductible amount.

3 Evidence of financial responsibility shall include one or more of the following:

4 (i) Separate fidelity bond coverage adequate to cover the amount
5 of the fidelity bond deductible.

6 (ii) A cash deposit held in a separate account, apart from other funds of the
7 broker, the broker's employees, or the broker's principals, in a bank or
8 recognized depository in this state adequate to cover the amount of the
9 fidelity bond deductible and held exclusively and solely for the purpose of
10 paying the fidelity bond deductible amount.

11 (iii) Any other evidence of financial responsibility approved by the
12 commissioner.

13 (3) An arrangement under which a person enumerated in subparagraph
14 (A),(B), or (C) of paragraph (2) is authorized to make withdrawals from a trust fund account of a
15 broker shall not relieve an individual broker, nor the broker-officer of a corporate broker
16 licensee, from responsibility or liability as provided by law in handling trust funds in the broker's
17 custody.

18 ...

19 (b) A real estate broker acting as a principal pursuant to Section 10131.1 shall
20 place all funds received from others for the purchase of real property sales contracts or
21 promissory notes secured directly or collaterally by liens on real property in a neutral escrow
22 depository unless delivery of the contract or notes is made simultaneously with the receipt of the
23 purchase funds.

24 ...

25

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1 (c) A real estate salesperson who accepts trust funds from others on behalf of the
2 broker under whom he or she is licensed shall immediately deliver the funds to the broker or, if
3 so directed by the broker, shall deliver the funds into the custody of the broker's principal or a
4 neutral escrow depository or shall deposit the funds into the broker's trust fund account."

5 ...

6 (g) The broker shall maintain a separate record of the receipt and disposition of all
7 funds described in subdivisions (a) and (b), including any interest earned on the funds..."

8 50.

9 **Retention of Records**

10 **(Code Section 10148)**

11 Pursuant to Code Section 10148 *Retention of Records – Chargeable Audits – Cost*
12 *Recovery – Penalties for Unlawful Destruction of Records:*

13 "(a) A licensed real estate broker shall retain for three years copies of all listings,
14 deposit receipts, cancelled checks, trust records, and other documents executed by him or her or
15 obtained by him or her in connection with any transactions for which a real estate broker license
16 is required. The retention period shall run from the date of the closing of the transaction or from
17 the date of the listing if the transaction is not consummated. After notice, the books, accounts,
18 and records shall be made available for examination, inspection, and copying by the
19 commissioner or his or her designated representative during regular business hours; and shall,
20 upon the appearance of sufficient cause, be subject to audit without further notice, except that the
21 audit shall not be harassing in nature. This subdivision shall not be construed to require a
22 licensed real estate broker to retain electronic messages of an ephemeral nature, as described in
23 subdivision (d) of Section 1624 of the Civil Code.

24 (b) The commissioner shall charge a real estate broker for the cost of any audit, if
25 the commissioner has found, in a final desist and refrain order issued under Section 10086 or in a

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1 final decision following a disciplinary hearing held in accordance with Chapter 5 (commencing
2 with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code that the broker
3 has violated Section 10145 or a regulation or rule of the commissioner interpreting Section
4 10145.

5 (c) The bureau may suspend or revoke the license of any real estate broker, real
6 estate salesperson , or corporation licensed as a real estate broker, if the real estate broker, real
7 estate salesperson, or any director, officer, employee, or agent of the corporation licensed as a
8 real estate broker knowingly destroys, alters, conceals, mutilates, or falsifies any of the books,
9 papers, writings, documents, or tangible objects that are required to be maintained by this section
10 or that have been sought in connection with an investigation, audit, or examination of a real
11 estate licensee by the commissioner.”

12 51.

13 **False or Fictitious Business Name**

14 **(Code Section 10159.5 and Regulation 2731)**

15 Pursuant to Code Section 10159.5(a)(1) *Fictitious Name*:

16 “Every person applying for a license under this chapter who desires to have the
17 license issued under a fictitious business name shall file with his or her application a certified
18 copy of his or her fictitious business name statement filed with the county clerk pursuant to
19 Chapter 5 (commencing with Section 17900) of Part 3 of Division 7.”

20 52.

21 Pursuant to Regulation 2731(a) *Use of False or Fictitious Name*:

22 “A licensee shall not use a fictitious name in the conduct of any activity for which
23 a license is required under the Real Estate Law unless the licensee is the holder of a license
24 bearing the fictitious business name.”

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2 **Grounds for Revocation or Suspension**

3 **(Code Section 10176)**

4 Pursuant to Code Section 10176 *Grounds for Revocation or Suspension*:

5 “The commissioner may, upon his or her own motion, and shall, upon the verified
6 complaint in writing of any person, investigate the actions of any person engaged in the business
7 or acting in the capacity of a real estate licensee within this state, and he or she may temporarily
8 suspend or permanently revoke a real estate licensee at any time where the licensee, while a real
9 estate licensee, in performing or attempting to perform any of the acts within the scope of this
10 chapter has been guilty of any of the following:

- 11 (a) Making any substantial misrepresentation...
- 12 (b) Making any false promise of a character likely to influence, persuade, or induce...
- 13 (c) A continued and flagrant course of misrepresentation or making of false promises
14 through licensees.
- 15 (d) Acting for more than one party in a transaction without the knowledge or consent of all
16 parties thereto.
- 17 (e) Commingling with his or her own money or property the money or other property of
18 others which is received and held by him or her.
- 19 (f) Claiming, demanding, or receiving a fee, compensation, or commission under any
20 exclusive agreement authorizing a licensee to perform any acts set forth in Section 10131
21 for compensation or commission where the agreement does not contain a definite,
22 specific date of final and complete termination.
- 23 (g) The claiming or taking by a licensee of any secret or undisclosed amount of
24 compensation, commission, or profit or the failure of a licensee to reveal to the buyer or
25 seller contracting with the licensee the full amount of the licensee’s compensation,

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1 commission, or profit under any agreement authorizing the licensee to do any acts for
2 which a license is required under this chapter for compensation or commission prior to or
3 coincident with the signing of an agreement evidencing the meeting of the minds of the
4 contracting parties, regardless of the form of the agreement, whether evidenced by
5 documents in an escrow or by any other or different procedure.

6 (h) The use by a licensee of any provision, which allows the licensee an option to purchase,
7 in an agreement with a buyer or seller that authorizes the licensee to sell, buy, or
8 exchange real estate or a business opportunity for compensation or commission, except
9 when the licensee, prior to or coincident with election to exercise the option to purchase,
10 reveals in writing to the buyer or seller the full amount of the licensee's profit and obtains
11 the written consent of the buyer or seller approving the amount of the profit.

12 (i) Any other conduct, whether of the same or of a different character than specified I this
13 section, which constitutes fraud or dishonest dealing.

14 (j) Obtaining the signature of a prospective buyer to an agreement which provides that the
15 prospective buyer shall either transact the purchasing, leasing, renting, or exchanging of a
16 business opportunity property through the broker obtaining the signature, or pay a
17 compensation to the broker if the property is purchased, leased, rented, or exchanged
18 without the broker first having obtained the written authorization of the owner of the
19 property concerned to offer the property for sale, lease, exchange, or rent.

20 (k) Failing to disburse funds in accordance with a commitment to make a mortgage loan that
21 is accepted by the applicant when the real estate broker represents to the applicant that
22 the broker is either of the following:

23 (1) The lender.

24 (2) Authorized to issue the commitment on behalf of the lender or lenders in the
25 mortgage loan transaction.

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1 (l) Intentionally delaying the closing of a mortgage loan for the sole purpose of increasing
2 interest, costs, fees, or charges payable by the borrower.

3 (m) Violating any section, division, or article of law which provides that a violation of that
4 section, division, or article of law by a licensed person is a violation of that person's
5 licensing law, if it occurs within the scope of that person's duties as a licensee."

6 54.

7
8 **Further Grounds for Disciplinary Action**

9 **(Code Section 10177 (selected portions))**

10 Pursuant to Code Section 10177 *Further Grounds for Disciplinary Action*

11 (selected portions):

12 "The commissioner may suspend or revoke the license of a real estate licensee,
13 delay the renewal of a license of a real estate licensee, or deny the issuance of a license to an
14 applicant, who has done any of the following:

15 ...

16 (d) Willfully disregarded or violated the Real Estate Law (Part 1 (commencing
17 with Section 10000)) or Chapter 1 (commencing with Section 11000) of Part 2 or the rules and
18 regulations of the commissioner for the administration and enforcement of the Real Estate Law
19 and Chapter 1 (commencing with Section 11000) of Part 2.

20 ...

21 (g) Demonstrated negligence or incompetence in performing an act for which the
22 officer, director, or person is required to hold a license.

23 (h) As a broker licensee, failed to exercise reasonable supervision over the
24 activities of that licensee's salespersons, or, as the officer designated by a corporate broker

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1 licensee, failed to exercise reasonable supervision and control of the activities of the corporation
2 for which a real estate license is required...”

3 **VIOLATIONS OF THE REAL ESTATE LAW – CAUSES FOR DISCIPLINE**

4 55.

5 Complainant re-alleges and incorporates by reference the preceding paragraphs as
6 set forth herein.

7 56.

8 **FIRST CAUSE FOR DISCIPLINE**

9 **Code Section 10137 and Code Section 10138 Penalties**

10 In the course of the activities described above, and based on the facts discovered
11 by the Department, as described above, the acts and/or omissions of Respondent **HUMBERTO**
12 **VILLANUEVA LOPEZ** and **MATIAS GABRIEL LIMON** are in violation of **Code Section**
13 **10137**, and pursuant to **Code Section 10177(d) and/or 10177(g)** constitute cause for the
14 suspension or revocation of all licenses, license rights and license endorsements of **LOPEZ** and
15 **LIMON** under the Real Estate Law, and subject **LOPEZ** and **LIMON** to penalties for said
16 violation(s) pursuant to **Code Section 10138**.

17 57.

18 **SECOND CAUSE FOR DISCIPLINE**

19 **Code Section 10140**

20 In the course of the activities described above, and based on the facts discovered
21 by the Department, as described above, the acts and/or omissions of **HUMBERTO**
22 **VILLANUEVA LOPEZ** and **GABRIEL MATIAS LIMON** are in violation of **Code Section**
23 **10140**, and pursuant to **Code Section 10177(d) and/or 10177(g)**, constitute cause for the
24 suspension or revocation of all licenses, license rights and license endorsements of **LOPEZ** and
25 **LIMON** under the Real Estate Law.

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1 58.

2 **THIRD CAUSE FOR DISCIPLINE**

3 **Code Section 10140.6 and Regulation 2773**

4 In the course of the activities described above, and based on the facts discovered
5 by the Department, as described above, the acts and/or omissions of **HUMBERTO**
6 **VILLANUEVA LOPEZ** and **GABRIEL MATIAS LIMON** are in violation of **Code Section**
7 **10140.6 and Regulation 2773**, and pursuant to **Code Section 10177(d) and/or 10177(g)**,
8 constitute cause for the suspension or revocation of all licenses, license rights and license
9 endorsements of **LOPEZ** and **LIMON** under the Real Estate Law.

10 59.

11 **FOURTH CAUSE FOR DISCIPLINE**

12 **Code Section 10145**

13 In the course of the activities described above, and based on the facts discovered
14 by the Department, as described above, the acts and/or omissions of Respondent **HUMBERTO**
15 **VILLANUEVA LOPEZ** are in violation of **Code Section 10145**, and pursuant to **Code**
16 **Section 10177(d) and/or 10177(g)**, constitute cause for the suspension or revocation of all
17 licenses, license rights and license endorsements of **LOPEZ** under the Real Estate Law.

18 60.

19 **FIFTH CAUSE FOR DISCIPLINE**

20 **Code Section 10159.5 and Regulation 2731**

21 In the course of the activities described above, and based on the facts discovered
22 by the Department, as described above, the acts and/or omissions of **HUMBERTO**
23 **VILLANUEVA LOPEZ** are in violation of **Code Section 10159.5 and Regulation 2731**, and
24 pursuant to **Code Section 10177(d) and/or 10177(g)** constitute cause for the suspension or
25

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1 revocation of all licenses, license rights and license endorsements of **LOPEZ** under the Real
2 Estate Law.

3 61.

4 **SIXTH CAUSE FOR DISCIPLINE**

5 **Code Section 10176(a)**

6 In the course of the activities described above, and based on the facts discovered
7 by the Department, as described above, the acts and/or omissions of Respondent **HUMBERTO**
8 **VILLANUEVA LOPEZ** are in violation of **Code Section 10176(a)** and constitute cause for the
9 suspension or revocation of all licenses, license rights and license endorsements of **LOPEZ**
10 under the Real Estate Law.

11 **COSTS**

12 62.

13 **Code Section 10106** provides, in pertinent part that in any order issued in
14 resolution of a disciplinary proceeding before the Department, the Commissioner may request
15 the administrative law judge to direct a licensee found to have committed a violation of this part
16 to pay a sum not to exceed the reasonable costs of investigation and enforcement of the case.

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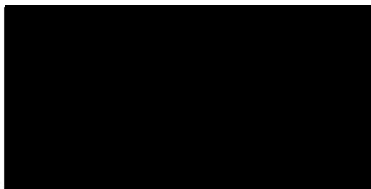
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1 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
2 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary
3 action against all the licenses, license rights, and license endorsements of Respondents
4 **HUMBERTO VILLANUEVA LOPEZ** and **GABRIEL MATIAS LIMON** under the Real
5 Estate Law (Part 1 of Division 4 of the Business and Professions Code), and for such other and
6 further relief as may be proper under other applicable provisions of law.

7 Dated at Los Angeles, California: MAY 27, 2025.

8
9
10
11  _____

igator

12 cc: Humberto Villanueva Lopez
13 Gabriel Matias Limon
14 David Sarinana (responsible REB for Limon)
15 R. Dagnino
16 Sacto.