

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

**MOTION TO REQUEST REMEDIATION  
AND URGENT REQUEST FOR AUDIT-INVESTIGATION  
LICENSE SUSPENSION AND REVOCATION**

**Ca# \_\_\_\_\_**

**Andreina Urdaneta  
Licensed Insurance Agent  
Corporate Senior Paralegal Acting ( Pro Se)  
California #4242007  
3408 Floyd Terrace  
Los Angeles California 90068**

**vs.**

Envision Strategic Partners, an LLC  
CC:Spencer Larkin  
Chief Executive Officer  
CC:West Foulger  
Chief Operating Officer & President of Business  
Development  
CC:Erin Creger  
Chief Sales Officer  
CC:Michael Escalante  
Regional Sales Director

350 WEST 800 NORTH  
STE 320 SALT LAKE CITY,  
UT 84103  
15 WEST SOUTH TEMPLE,  
SUITE 600 Salt  
Lake City, UT 84101

**VIA EMAIL**

**CC:**

**Jacob W. Garn**

**Director**

**Financial Regulations & Business Licencing**

4315 S. 2700 W., Suite 2300

Taylorsville, UT 84129

**Utah Insurance Department**

**Fraud & Prosecution Investigations**

**Armand Glick**

**Director Fraud Department Unit**

4315 S. 2700 W., Suite 2300

Taylorsville, UT 84129

**UTAH INSURANCE DEPARTMENT**

**Daryl Bell**

**Assistant Attorney General**

4315 S. 2700 W., Suite 2300

Taylorsville, UT 84129

**UTAH DEPARTMENT OF COMMERCE**

**Division of Occupational and Professional Licensing**

**Heber M. Wells Building**

160 East 300 South

P.O. Box 146741

Salt Lake City,

UT 84114-6741

**MARK STEINAGEL**

**Division of Occupational and Professional Licensing**

**Executive Director Division Director**

**Heber M. Wells Building**

160 East 300 South

P.O. Box 146741

Salt Lake City,

UT 84114-6741

**CALIFORNIA DEPARTMENT OF INSURANCE**

**Los Angeles Regional Office**

**Rick Edmonson**

**Captain**

5999 East Slauson Avenue  
City of Commerce, CA 90040

**LOS ANGELES COUNTY DEPARTMENT OF FRAUD DIVISION  
MANAGEMENT**

**George Mueller, Deputy Commissioner**

Enforcement Branch

Los Angeles Regional Office

5999 East Slauson Avenue  
City of Commerce, CA 90040

**LOS ANGELES REGIONAL OFFICE  
DIVISION OF FRAUD PROFESSIONAL LICENSE**

**Los Angeles Regional Office**

**Eric Charlick, Division Chief**

**Fraud Division**

Los Angeles Regional Office

5999 East Slauson Avenue  
City of Commerce, CA 90040 .

**Us Department of Labor wages  
Labor Enforcement Task Force (LETf)**

Central District of California  
312 North Spring Street  
Suite 1200  
Los Angeles, California 90012

**California Occupational Licensing Inspections  
Business Fraud License Revocation Dept**

1365 Grand Ave #102,  
Covina, CA 91724

**The Los Angeles County Department of  
Consumer and Business Affairs.**

**Vendor Affairs ethics & Fraud Prevention**

4343 Lennox Blvd.  
Lennox , CA 90304

**The City of Los Angeles Department of Consumer and  
business Affairs Vendor affairs ethics & Fraud  
Prevention**

320 W Temple St Room G-10,  
Los Angeles, CA 90012

**US Department of Labor**

**District Office Los Angeles California**

Honorable Anna Y. Park  
Regional District Attorney  
Roybal Federal Building  
255 East Temple St., 4th Floor  
Los Angeles, CA 90012

**State of California Department of Industrial Relations  
Wage Fraud**

Elihu Harris State Building  
1515 Clay Street, Conference Room 2, 2nd Floor  
Oakland, CA 94612

1. I ANDREINA URDANETA was contacted, recruited, and offered an Insurance sales exclusive position to work with what they called a business partner Mortuary that I would attend as a sales Agent, I was hired and contracted by the company directly. I was contracted to Envision Strategic Partners, an LLC registered with the Department of Commerce in Utah, doing business in Utah and California hereby declare that the following allegations are true and correct to the best of my knowledge. Videos, Texts and personal allegations are true and correct to the best of my knowledge.
2. Envision Strategic Partners, an LLC and/or are engaged in dangerous unethical, deceiving, fraudulent recruiting, business management and advertising practices.
3. Envision Strategic Partners, an LLC is using its operational business license and Insurance Broker License engaging in illegal and criminal practices with ill intent to gain financial advantages.
4. I have reasons to believe that there may be illegal & unauthorized insurance practices involving Envision Strategic Partners, an LLC. I ask the above mentioned units to immediately investigate the agreements, contracts, payments made to these companies in exchange for the Insurance enrollment desk, with Fontana Mortuary , Ingold Mortuary and any other mortuaries unnamed in Van Nuys, Hollywood as well as Salt Lake City and any other State in which this company is licensed to do business.
5. I ask the Internal Revenue service to conduct an investigation as I have reasons to believe this company does not follow laws or regulations.

6. I kindly ask this court to grant an injunction to stop and revoke the operational license until the investigation is over or until the court feels it is appropriate or until, to stop the Envision Strategic Partners, an LLC group in California & Utah from taking advantage of the public and the hard working people and Ethical Agents who are trusting that they are honoring the privilege of doing business in ways that will not harm the public.
7. The Envision Strategic Partners, an LLC Group is fully aware and conscious of the unethical practices, and they do not take responsibility for their harming actions to the members of our community.
8. The Envision Strategic Partners, an LLC group is abusing the occupational license privileges by violating the business practices without remorse and with intimidation, threatening behavior and using overly aggressive intimidation practices to elude and minimize the inconvenience of their actions..
9. Envision Strategic Partners, an LLC uses Agent recruiting unethical hiring practices and deceiving marketing strategies, deceiving business practices.
10. I kindly ask this court and all called government entities hereby mentioned and included in this request, to have the team refrain and stop deceiving sales practices. Stop using the privilege of a business license maliciously and with intent and awareness
11. I ask the departments above to investigate the business and To contact Agents to make sure that every Agent got properly paid the commissions or salaries owed.

12. I kindly ask this court and all above-mentioned responsible individuals to suspend the license until investigation is clear from any findings of fraudulent competitive practices, that every employee has equality in pay and treatment in pay.
13. I ask this court with this motion and all entities here mentioned to urgently activate an investigation for Envision Strategic Partners, an LLC and all other entities for which this petition has been registered to urgently pay attention and stop Envision Strategic Partners, an LLC from any more careless and negligent acts, aI ask the department of Labor to initiate an investigation as I have been treated unfairly and the company was very clearly aware of my circumstances when accepting the position and I made my conditions clear and I made direct decisions based on this offer that by now is representing loses of over \$4000 dollars
14. I with much respect ask the department of labor to kindly investigate the payroll practices and hiring practices. Furthermore, I ask for a full audit as they hired me as a sales representative, they made me an offer of 800 dollars draw and they perfectly well knew my conditions and agreements based on my financials and when I arrived at jobsite I was told that there was no money to pay me for my draw at all that they were sorry and offered me a gift card and got aggressive to the the point I felt in danger and ran out of the office as the District Manager got extremely threatening and aggressive intimidating me because I was asking where the owners were, they knew I left a job to accept this position and they just without showing any remorse kicked me out of

the office and got extremely aggressive because I thought it was a terrible irresponsible & illegal hiring practice.

15. After I left I called the Recruiter who sent all my calls to voicemail, hiding behind the phone, and no one answered any of my messages, truly very used to doing this and obviously worked up until now.
16. Based on the way the Regional Manager behaved I feel that he or the Company may try to harm me or retaliate and they have my address, I want to let it be known that if anything happens to me he is the first person and his partner to investigate. The Aggressive intimidation used leads me to believe this is someone who will retaliate because of this accusation. The entire company is hiding behind their phones and no one is answering me.
17. They are not answering the demand for explanation, furthermore they have not answered any calls I have placed.
18. Envision Strategic Partners, an LLC was supposed to make the first agreed salary based on commissions payment of \$ 800.00 and overage commissions 1/6/2023 weekly to be drawn against commissions for the first 9 weeks of work, the offer was made by the Envision Strategic Partners, an LLC to help me choose them over my work opportunity over my new employer. I quit based on this offer and they knew it.
19. We started the training , talking about leads, the ways the company works, and he didn't even think it was important to clarify the fact that his proposal was a lie. He complimented my executive look, my grooming, my resume and professionalism, he commented on knowing for sure that I was going to be an asset for the company and he said he was sorry

that if I could work without pay he would help me to put a table someplace so I could give him the business but he will not pay like he thought he would, that it was approved and last minute they just changed their mind " he continued asking me for signed checks" of my bank account so they could keep them as a guarantee of work and he also asked if it was okay to send me an invoice and give him a check to make sure I would work, he went from unable to pay you to give me a signed check as a guarantee you will work and on top of that he got mad, offended and aggressive as well as threatening when I asked for him to call the owners. It was the most weird and irresponsible hiring practice and when he saw he wasn't going to convince me to work for free to get paid in the future he tried to intimidate me again, he laughed and asked me to close the door on my way out.

20. The Government is responsible for protecting honorable citizens and to keep law and order by protecting the community it serves. I ask with kindness and respect that every single department here involved by name responds for the best of our community by keeping unethical, fraudulent, deceiving and dangerous companies like this one, from using the license given to them and that they as officers shall remain obedient and respect their fiduciary commitments as they were trusted and licensed by the Government to do business and an honorable company.
21. Envision Strategic Partners, an LLC was asking me to give them signed checks for the amount of the draw weekly and they would later send an invoice and they would pay me and the funeral home.

22. I show up to work, starts the training, half an hour into the training, Envision Strategic Partners, an LLC California Michael Escalante decides to tell me hey by the way, there is no money to pay you, that won't happen and started to sale me on the idea of giving me work in flea markets for future commissions, furthermore he decided for me that my new commissions structure was going change from what we agreed without anyone telling me or consulting or even asking if it was okay to deduct and the Director of Recruiting Cody Spradlin, won't even answer the phone to explain what happened or remediate, They entire company was hiding under the caller ID
23. The payroll practices are deceiving and dangerous. I will be homeless in two weeks because I accepted this job under a false offer and they knew I was going to quit a stable job for this offer they made. I will not have time to get a new job and be paid by the 19th of January. I will be homeless because of the false offer, unethical behavior, unethical business practices, irresponsible and deceiving marketing practices, and now no one answers the phone hoping this will go away.

#### REMEDIATION

- I ask this court to grant a minimum sum of \$7200.00 which will represent the 9 weeks of draws promised so I can buy time to now get a new job with the same offer of the one I lost based on the offer I accepted.
- I ask this court and the attorney general to remove and revoke the licenses until they retrain and get certified to do business in an

ethical manner to avoid more harm to the community they serve.

- Business ethics course and to take again the class for ethical business practices and abide by the law in responsible hiring practices.
- To hire a professional HR and IC support firm responsible for facing the aftermath responsibly and don't hide behind the phones not taking ownership or caring about the harm done.
- I ask this court to remove suspend the Insurance licenses
- I ask this court to grant an extra daily payment of \$100 for each day they take to pay me the requested 9 weeks they offered to cover for losses directly caused by this fraudulent job offer. Furthermore I kindly ask this court to grant all court fees, attorneys fees, maximum compensation and all punitive damages that this court may consider just.
- I request an investigation for potential Labor Law violations including but not limited to:
- Over Time moneys owed to past employees and the immediate remediation of such violations with all allowed punitive damages and other fees the court determines fair.
- I ask for an investigation for discrimination. I believe I has been a victim of discrimination by nationality, age & gender
- I believe I was a victim of unfair employment practices and irresponsible hiring practices
- I ask both Counties, Cities & States to revoke any vendor access, business licenses, occupational Licenses, Insurance Licenses as they have endangered me as an employee engaging me in misleading and false and unethical sales & marketing practices,

considered a violation by the Department of Insurance, the city, the county and State. This fraudulent behavior will cost me my home, my car, and my stability if I don't find a job tomorrow. My little girl has no one else in this world for me and we will both end up homeless and this man laughed at me walking out in defeat asking me to close the door with an ironing and terribly sarcastic smile.

- I ask this court to consider void any type of agreements and all of its clauses void as the perpetrator is in full breach of any agreements previously made
- As A New Insurance Agent I call the full force of the California Department of Insurance to initiate an immediate investigation in regards to this company who is recruiting newly licensed Agents with ill intent and creating false advertising, false offers and recruiting practices that will leave a professional like me homeless because of this unethical and predatory Recruiting practices.

A licensed individual and corporation in such a privileged position to serve, should be following the laws carefully, they have the responsibility to care for their employees, to train them ethically, to pay them on time, to care about their communities, customers, employees. This is a company that is not only engaged in deceiving and questionable business practices but uses deceiving and illegal methods to achieve winnings and enslave and take advantage and intimidate individuals who they consider to be weaker..

I ask these agencies to temporarily revoke all operational licenses until these very delicate allegations are investigated and the company remediates and corrects illegal, unethical and fraudulent business tactics. I am in a position where I trusted the ethical practices of this company and this may take me to homelessness if I don't get a job now immediately and with today's economy I am afraid that I made direct decisions based on fraudulent, deceiving and irresponsible job offers.

[Andreina Urdaneta](#)

( 1/4/2023)

Diginatty Signed

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