

1 Department of Real Estate  
2 P.O. Box 137007  
3 Sacramento, CA 95815-7007  
4 Telephone: (916) 576-8700

**FILED**

**SEP 27 2021**

DEPARTMENT OF REAL ESTATE  
By B. Nicholas

5  
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7  
8 **BEFORE THE DEPARTMENT OF REAL ESTATE**  
9 **STATE OF CALIFORNIA**

10 \* \* \*

11 In the Matter of the Accusation of

12 TITAN REAL ESTATE GROUP, INC. and  
13 ANGELIA GAIL TRIGUEIRO,

14 Respondents.)

No. H-3334 FR

STIPULATION AND  
AGREEMENT TO  
SURRENDER

15 It is hereby stipulated by and between TITAN REAL ESTATE GROUP, INC.  
16 and ANGELIA GAIL TRIGUEIRO (collectively "Respondents"), and the Complainant,  
17 acting by and through Truly Sughrue, Counsel for the Department of Real Estate  
18 (Department), as follows for the purpose of settling and disposing the First Amended  
19 Accusation (Accusation) filed on June 10, 2021, in this matter:

20 1. All issues which were to be contested and all evidence which was to be  
21 presented by Complainant and Respondents at a formal hearing on the Accusation, which  
22 hearing was to be held in accordance with the provisions of the Administrative Procedure Act  
23 (APA), shall instead and in place thereof be submitted solely on the basis of the provisions of  
24 this Stipulation and Agreement to Surrender (Stipulation).

25 2. Respondents have received, read, and understand the Statement to  
26 Respondent, and the Discovery Provisions of the APA filed by the Department in this  
27 proceeding.

1                   3.       Respondents filed a Notice of Defense pursuant to Section 11505 of the  
2 Government Code for the purpose of requesting a hearing on the allegations in the Accusation.  
3 Respondents hereby freely and voluntarily withdraw said Notice of Defense. Respondents  
4 acknowledge that Respondents understand that by withdrawing said Notice of Defense  
5 Respondents will thereby waive Respondents' rights to require the Real Estate Commissioner  
6 (Commissioner) to prove the allegations in the Accusation at a contested hearing held in  
7 accordance with the provisions of the APA, and that Respondents will waive other rights  
8 afforded to Respondents in connection with the hearing such as the right to present evidence in  
9 defense of the allegations in the Accusation and the right to cross-examine witnesses.

10                   4.       It is understood by the parties that the Commissioner may adopt the  
11 Stipulation as his decision in this matter thereby imposing the penalty and sanctions on the real  
12 estate licenses and license rights of Respondents as set forth in the below "Order". In the event  
13 that the Commissioner in his discretion does not adopt the Stipulation, it shall be void and of no  
14 effect, and Respondents shall retain the right to a hearing and proceeding on the Accusation  
15 under all the provisions of the APA and shall not be bound by any admission or waiver made  
16 herein.

17                   5.       The Order or any subsequent Order of the Commissioner made pursuant to  
18 this Stipulation shall not constitute an estoppel, merger or bar to any further administrative or  
19 civil proceedings by the Department with respect to any matters which were not specifically  
20 alleged in Accusation H-3334 FR.

21                   DECLARATION OF TITAN REAL ESTATE GROUP, INC.

22                   In lieu of proceeding in this matter in accordance with the provisions of the APA,  
23 TITAN REAL ESTATE GROUP, INC. (TREGI) wishes to voluntarily surrender its corporate  
24 real estate broker license issued by the Department, pursuant to Code Section 10100.2.  
25 ANGELIA GAIL TRIGUEIRO (TRIGUEIRO) is the Designated Officer of TREGI, and is  
26 authorized to sign this declaration on behalf of TREGI.  
27

1 TRIGUEIRO, on behalf of TREGI, understands that by voluntarily surrendering  
2 TREGI's license(s), TREGI may be re-licensed as a corporate broker only by petitioning for  
3 reinstatement pursuant to section 11522 of the Government Code. TRIGUEIRO, on behalf of  
4 TREGI, also understands that by voluntarily surrendering TREGI license(s), TRIGUEIRO  
5 agrees to the following:

6 1. The filing of this Declaration shall be deemed as TREGI's petition for  
7 voluntary surrender.

8 2. It shall also be deemed to be an understanding and agreement by  
9 TRIGUEIRO that TREGI waives all rights TREGI has to require the Commissioner to prove the  
10 allegations contained in the Accusation filed in this matter at a hearing held in accordance with  
11 the provisions of the APA, and that TREGI also waives other rights afforded to TREGI in  
12 connection with the hearing such as the right to discovery, the right to present evidence in  
13 defense of the allegations in the Accusation and the right to cross-examine witnesses.

14 3. TRIGUEIRO, on behalf of TREGI, further agrees that upon acceptance by  
15 the Commissioner, as evidenced by an appropriate order, all affidavits and all relevant evidence  
16 obtained by the Department in this matter prior to the Commissioner's acceptance, and all  
17 allegations contained in the Accusation filed in the Department Case No. H-3334 FR may be  
18 considered by the Department to be true and correct for the purpose of deciding whether to grant  
19 re-licensure or reinstatement pursuant to Government Code section 11522.

20 4. TRIGUEIRO freely and voluntarily surrenders all of TREGI's licenses  
21 and license rights under the Real Estate Law.

22 DECLARATION OF ANGELIA GAIL TRIGUEIRO

23 In lieu of proceeding in this matter in accordance with the provisions of the APA,  
24 I, TRIGUEIRO, wish to voluntarily surrender my real estate license(s) issued by the Department,  
25 pursuant to Business and Professions Code section 10100.2.

26 I understand that by voluntarily surrendering my license(s), I may be re-licensed  
27 as a salesperson or as a broker only by petitioning for reinstatement pursuant to section 11522 of

1 the Government Code. I also understand that by voluntarily surrendering my license(s), I agree  
2 to the following:

3 1. The filing of this Declaration shall be deemed as my petition for  
4 voluntary surrender.

5 2. It shall also be deemed to be an understanding and agreement by me that  
6 I waive all rights I have to require the Commissioner to prove the allegations contained in the  
7 Accusation filed in this matter at a hearing held in accordance with the provisions of the APA,  
8 and that I also waive other rights afforded to me in connection with the hearing such as the  
9 right to discovery, the right to present evidence in defense of the allegations in the Accusation  
10 and the right to cross-examine witnesses.

11 3. I further agree that upon acceptance by the Commissioner, as evidenced  
12 by an appropriate order, all affidavits and all relevant evidence obtained by the Department in  
13 this matter prior to the Commissioner's acceptance, and all allegations contained in the  
14 Accusation filed in the Department Case No. H-3334 FR may be considered by the Department  
15 to be true and correct for the purpose of deciding whether to grant re-licensure or reinstatement  
16 pursuant to Government Code section 11522.

17 4. I freely and voluntarily surrender all my licenses and license rights  
18 under the Real Estate Law.

19 \* \* \*

20 ORDER

21 I

22 TREGI's petition for voluntary surrender of its corporate real estate broker  
23 license is accepted as of the effective date of this Order as set forth below, based upon the  
24 understanding and agreement expressed in TREGI's Declaration incorporated herein as part of  
25 this Stipulation. TREGI's license certificates, pocket cards and any branch office license  
26 certificates shall be sent to the below listed address so that they reach the Department on or  
27 before the effective date of this Order:

1 DEPARTMENT OF REAL ESTATE  
2 Attn: Licensing Flag Section  
3 P. O. Box 137013  
4 Sacramento, CA 95815-7013

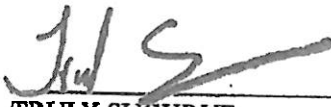
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6 TRIGUEIRO's petition for voluntary surrender of her real estate broker license is  
7 accepted as of the effective date of this Order as set forth below, based upon the understanding  
8 and agreement expressed in TRIGUEIRO's Declaration incorporated herein as part of this  
9 Stipulation. TRIGUEIRO's license certificates, pocket cards and any branch office license  
10 certificates shall be sent to the below listed address so that they reach the Department on or  
11 before the effective date of this Order:

12 DEPARTMENT OF REAL ESTATE  
13 Attn: Licensing Flag Section  
14 P. O. Box 137013  
15 Sacramento, CA 95813-7013

16 6 July 2021

17 DATED

18   
19 TRULY SUGHRUE  
20 Counsel for Complainant

21 \* \* \*

22 I have read the Stipulation and Agreement, and its terms are understood by me  
23 and are agreeable and acceptable to me. I understand that I am waiving rights given to me by the  
24 California Administrative Procedure Act, and I willingly, intelligently and voluntarily waive  
25 those rights, including the right of requiring the Commissioner to prove the allegations in the  
26 Accusation at a hearing at which I would have the right to cross-examine witnesses against me  
27 and to present evidence in defense and mitigation of the charges.

Respondents further agree to send the original signed Stipulation by mail to the  
following address no later than one (1) week from the date the Stipulation is signed by  
Respondents: *Department of Real Estate, Legal Section, P.O. Box 137007, Sacramento,*

1 California 95813-7007. Respondents understand and agree that if they fail to return the original  
2 signed Stipulation by the due date, Complainant retains the right to set this matter for hearing.  
3

4 TITAN REAL ESTATE GROUP, INC.  
Respondent

5  
6 DATED

7/2/2021

By:

Angelia Gail Trigueiro  
Designated Officer

8  
9 DATED

7/2/2021

ANGELIA GAIL TRIGUEIRO  
Respondent

11 \*\*\*

12 I have reviewed the Stipulation and Agreement as to form and content and have  
13 advised my client accordingly.

14  
15 DATED

7-5-21

DAVE McNAMARA  
Attorney for Respondents

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18 The foregoing Stipulation is hereby adopted as my Decision and Order and shall  
19 become effective at 12 o'clock noon on OCT 18 2021

20  
21 IT IS SO ORDERED

9.21.21

22 DOUGLAS R. McCAULEY  
23 Real Estate Commissioner

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