

1 STEVE CHU, Counsel (SBN 238155)
2 Department of Real Estate
3 320 West 4th Street, Suite 350
4 Los Angeles, California 90013-1105

4 Telephone: (213) 620-6430
5 Fax: (213) 576-6917

FILED

JAN 12 2022

DEPT. OF REAL ESTATE

By 

9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-05234 SD
13)
14 MIGUEL ANGEL MANZANARES,) FIRST AMENDED
15 individually and as designated officer of) ACCUSATION
16 Flagship Real Estate Group,)
17 FLAGSHIP REAL ESTATE GROUP,)
18 CASA GRAN REAL ESTATE INC,)
19 doing business as Padre Mortgage,)
20 KATY MEYERS,)
21 individually and as designated officer of)
22 Casa Gran Real Estate Inc,)
23 BRIDGET ROSE MANZANARES,)
24 TERESA MARIE BECKETT,)
25 CHRISTINE ANN MEZA,)
26 CATHY VERONICA ALLCORN-DOWNING,)
27 BIANCA RAQUEL MARQUEZ,)
JULIE ANN ERWIN, and)
RUBEN ALBERTO MEZA,)
Respondents.)

First Amended Accusation of Miguel Angel Manzanares, Flagship Real Estate Group, Casa Gran Real Estate Inc, Katy Meyers, Bridget Rose Manzanares, Teresa Marie Beckett, Christine Ann Meza, Cathy Veronica Allcorn-Downing, Bianca Raquel Marquez, Julie Ann Erwin, and Ruben Alberto Meza

1 This First Amended Accusation amends the Accusation filed on June 10, 2021.
2 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of
3 California, for cause of Accusation against MIGUEL ANGEL MANZANARES, individually
4 and as designated officer of Flagship Real Estate Group, FLAGSHIP REAL ESTATE GROUP,
5 CASA GRAN REAL ESTATE INC, doing business as Padre Mortgage, KATY MEYERS,
6 individually and as designated officer of Casa Gran Real Estate Inc, BRIDGET ROSE
7 MANZANARES, TERESA MARIE BECKETT, CHRISTINE ANN MEZA, CATHY
8 VERONICA ALLCORN-DOWNING, BIANCA RAQUEL MARQUEZ, JULIE ANN ERWIN,
9 and RUBEN ALBERTO MEZA, (“Respondents”), is informed and alleges as follows:

10 1.

11 The Complainant, Veronica Kilpatrick, acting in her official capacity as a
12 Supervising Special Investigator of the State of California, makes this Accusation against
13 Respondents MIGUEL ANGEL MANZANARES, FLAGSHIP REAL ESTATE GROUP,
14 CASA GRAN REAL ESTATE INC, KATY MEYERS, BRIDGET ROSE MANZANARES,
15 TERESA MARIE BECKETT, CHRISTINE ANN MEZA, CATHY VERONICA
16 ALLCORN-DOWNING, BIANCA RAQUEL MARQUEZ, JULIE ANN ERWIN, and RUBEN
17 ALBERTO MEZA.

18 2.

19 All references to the “Code” are to the California Business and Professions Code
20 and all references to “Regulations” are to Title 10, Chapter 6, California Code of Regulations.

21 LICENSE HISTORY

22 3.

23 Respondent MIGUEL ANGEL MANZANARES (“MIGUEL
24 MANZANARES”) presently has license rights under the Real Estate Law, Part 1 of Division 4
25 of the Code as a restricted real estate broker. MIGUEL MANZANARES’S license
26 identification number is 01356344.

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4.

On or about October 25, 2013, the Real Estate Commissioner in Case No. H-04533 SD adopted as his Decision effective October 25, 2013, a Stipulation and Waiver denying Respondent MIGUEL MANZANARES’S application for a real estate broker license but granting MIGUEL MANZANARES the right to a restricted real estate broker license on terms and conditions. MIGUEL MANZANARES stipulated that cause existed for the denial of MIGUEL MANZANARES’S application for a real estate broker license on the grounds of a conviction for violation of California Health and Safety Code section 11357(a) (Possession of Marijuana), a felony.

5.

Respondent MIGUEL MANZANARES licensed the fictitious business name “Flagship Real Estate Group” with the Department of Real Estate (“Department”) from about March 30, 2015, to about March 20, 2020.

6.

All the licenses, license endorsements, and license rights of Respondent MIGUEL MANZANARES were suspended by the Department effective on or about January 17, 2019, until about October 16, 2019, pursuant to California Family Code section 17520.

7.

Respondent FLAGSHIP REAL ESTATE GROUP presently has license rights as a corporate real estate broker. FLAGSHIP REAL ESTATE GROUP’S license identification number is 02021350.

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1 8.

2 From about July 3, 2020, to the present, Respondent FLAGSHIP REAL
3 ESTATE GROUP is licensed by the Department as a corporate real estate broker by and
4 through Respondent MIGUEL MANZANARES, as the designated officer and broker
5 responsible, pursuant to Code section 10159.2, for supervising the activities requiring a real
6 estate license conducted on behalf of FLAGSHIP REAL ESTATE GROUP, or by FLAGSHIP
7 REAL ESTATE GROUP'S officers, agents and employees.

8 9.

9 From about August 18, 2018, to about July 2, 2020, Respondent FLAGSHIP
10 REAL ESTATE GROUP was licensed but not affiliated with any designated officer.

11 10.

12 Respondent CASA GRAN REAL ESTATE INC ("CASA GRAN REAL
13 ESTATE") presently has license rights as a corporate real estate broker. CASA GRAN REAL
14 ESTATE'S license identification number is 01516418. CASA GRAN REAL ESTATE also
15 has a company mortgage loan originator license endorsement.

16 11.

17 Respondent KATY MEYERS ("MEYERS") presently has license rights as a
18 real estate broker. MEYERS also has an individual mortgage loan originator license
19 endorsement.

20 12.

21 Respondent CASA GRAN REAL ESTATE is licensed by the Department as a
22 corporate real estate broker by and through MEYERS, as the designated officer and broker
23 responsible, pursuant to Code section 10159.2, for supervising the activities requiring a real
24 estate license conducted on behalf of CASA GRAN REAL ESTATE, or by CASA GRAN
25 REAL ESTATE'S officers, agents and employees.

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14.

Respondent BRIDGET ROSE MANZANARES (“BRIDGET MANZANARES”) presently has license rights as a real estate salesperson.

15.

Respondent BRIDGET MANZANARES was licensed and affiliated with responsible broker Respondent MIGUEL MANZANARES from about November 7, 2018, to about December 8, 2018. From about December 9, 2018, to about February 21, 2019, BRIDGET MANZANARES was licensed but not affiliated with any broker. From about February 22, 2019, to about December 19, 2019, BRIDGET MANZANARES was licensed and affiliated with responsible broker Respondent CASA GRAN REAL ESTATE.

16.

Respondent TERESA MARIE BECKETT (“BECKETT”) presently has license rights as a real estate salesperson.

17.

Respondent BECKETT was licensed and affiliated with responsible broker Respondent MIGUEL MANZANARES from about November 6, 2018, to about January 16, 2019. From about January 17, 2019, to about March 5, 2019, BECKETT was licensed but not affiliated with any broker. From about March 6, 2019, to about March 11, 2019, BECKETT was licensed and affiliated with responsible broker R-MAC Properties Inc. From about March 12, 2019, to about April 30, 2019, BECKETT was licensed and affiliated with responsible broker E&V Ranch And Coast, Inc. BECKETT has never been affiliated with broker Respondent FLAGSHIP REAL ESTATE GROUP. BECKETT has never been affiliated with broker Respondent CASA GRAN REAL ESTATE.

18.

Respondent CHRISTINE ANN MEZA (“CHRISTINE MEZA”) presently has license rights as a real estate salesperson.

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19.

Respondent CHRISTINE MEZA was licensed and affiliated with responsible broker Respondent MIGUEL MANZANARES from about November 6, 2018, to about January 16, 2019. From about January 17, 2019, to about February 26, 2019, CHRISTINE MEZA was licensed but not affiliated with any broker. From about February 27, 2019, to about December 19, 2019, CHRISTINE MEZA was licensed and affiliated with responsible broker Respondent CASA GRAN REAL ESTATE.

20.

Respondent CATHY VERONICA ALLCORN-DOWNING (“ALLCORN-DOWNING”) presently has license rights as a real estate salesperson.

21.

Respondent ALLCORN-DOWNING was licensed and affiliated with responsible broker Respondent MIGUEL MANZANARES from about November 6, 2018, to about January 16, 2019. From about January 17, 2019, to about February 26, 2019, ALLCORN-DOWNING was licensed but not affiliated with any broker. From about February 27, 2019, to about June 17, 2019, ALLCORN-DOWNING was licensed and affiliated with responsible broker Respondent CASA GRAN REAL ESTATE.

22.

Respondent BIANCA RAQUEL MARQUEZ (“MARQUEZ”) presently has license rights as a real estate salesperson.

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1 23.

2 Respondent MARQUEZ was licensed and affiliated with responsible broker
3 Respondent MIGUEL MANZANARES from about November 8, 2018, to about
4 January 16, 2019. From about January 17, 2019, to about February 21, 2019, MARQUEZ was
5 licensed but not affiliated with any broker. From about February 22, 2019, to about
6 June 12, 2019, MARQUEZ was licensed and affiliated with responsible broker Respondent
7 CASA GRAN REAL ESTATE.

8 24.

9 Respondent JULIE ANN ERWIN ("ERWIN") presently has license rights as a
10 real estate salesperson.

11 25.

12 Respondent ERWIN was licensed and affiliated with responsible broker
13 Respondent MIGUEL MANZANARES from about November 13, 2018, to about
14 January 16, 2019. From about January 17, 2019, to about February 26, 2019, ERWIN was
15 licensed but not affiliated with any broker. From about February 27, 2019, to about
16 December 19, 2019, ERWIN was licensed and affiliated with responsible broker Respondent
17 CASA GRAN REAL ESTATE.

18 26.

19 Respondent RUBEN ALBERTO MEZA ("RUBEN MEZA") presently has
20 license rights as a real estate salesperson.

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1 27.

2 Respondent RUBEN MEZA was licensed and affiliated with responsible broker
3 Respondent MIGUEL MANZANARES from about November 6, 2018, to about
4 January 16, 2019. From about January 17, 2019, to about February 21, 2019, RUBEN MEZA
5 was licensed but not affiliated with any broker. From about February 22, 2019, to about
6 December 19, 2019, RUBEN MEZA was licensed and affiliated with responsible broker
7 Respondent CASA GRAN REAL ESTATE.

8 OFFICE ADDRESSES

9 28.

10 From about September 27, 2018, through about January 16, 2019, the main
11 office address maintained by Respondent MIGUEL MANZANARES with the Department was
12 531 Encinitas Blvd Ste #204, Encinitas, CA 92024.

13 29.

14 From about November 18, 2019, through about March 20, 2020, the main office
15 address maintained by Respondent MIGUEL MANZANARES with the Department was
16 531 Encinitas Blvd Ste #204, Encinitas, CA 92024.

17 30.

18 From about January 13, 2017, through about August 17, 2018, the main office
19 address maintained by Respondent FLAGSHIP REAL ESTATE GROUP with the Department
20 was 531 Encinitas Blvd Ste 204, Encinitas, CA 92024.

21 31.

22 From about July 3, 2020, through the present, the main office address
23 maintained by Respondent FLAGSHIP REAL ESTATE GROUP with the Department is
24 531 Encinitas Blvd Ste 204, Encinitas, CA 92024.

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32.

From about May 31, 2017, through the present, the main office address maintained by Respondent CASA GRAN REAL ESTATE with the Department is 1613 Linda Sue Ln, Encinitas, CA 92024.

33.

Respondent CASA GRAN REAL ESTATE has never maintained a branch office with the Department.

34.

From about May 20, 2017, through the present, the main office address maintained by Respondent MEYERS with the Department is 1613 Linda Sue Lane, Encinitas, CA 92024.

35.

Respondent MEYERS has never maintained a branch office with the Department.

SALE OF LAKE BLVD PROPERTY

36.

On or about January 2, 2019, seller Primo Farms LLC entered into a Residential Listing Agreement with broker Respondent FLAGSHIP REAL ESTATE GROUP through salesperson Respondent BECKETT to sell real property at 4125 Lake Blvd, San Diego, CA 92056 ("Lake Blvd property").

37.

On or about February 4, 2019, buyers Y. Borges and M. Borges submitted an offer to purchase the Lake Blvd property through a signed Residential Purchase Agreement to Respondent MIGUEL MANZANARES and Respondent BECKETT.

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38.

On or about February 5, 2019, Respondent MIGUEL MANZANARES emailed the buyers' agents with a counter offer for the Lake Blvd property. MIGUEL MANZANARES wrote, "Here is the counter offer from the sellers. I'll call you and we can go over all the details".

39.

On or about February 6, 2019, Respondent MIGUEL MANZANARES emailed the escrow officer with the signed Residential Purchase Agreement for the Lake Blvd property.

40.

On or about February 13, 2019, Respondent MIGUEL MANZANARES and Respondent BECKETT signed a Commission Disbursement Authorization for the Lake Blvd property. MIGUEL MANZANARES signed the Commission Disbursement Authorization on behalf of Respondent FLAGSHIP REAL ESTATE GROUP. The Commission Disbursement Authorization provided instructions for a check in the amount of \$3,044.55 to be sent to BECKETT, a check in the amount of \$5,846.45 to be sent to FLAGSHIP REAL ESTATE GROUP, and a check in the amount of \$400 to be sent to Respondent CHRISTINE MEZA. The Commission Disbursement Authorization provided instructions for the checks to be sent to 531 Encinitas Blvd, Suite 204, Encinitas, CA 92024. The footer of the Commission Disbursement Authorization included, "DRE 02021350".

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1 41.

2 On or about March 8, 2019, Respondent CASA GRAN REAL ESTATE and
3 Respondent BRIDGET MANZANARES signed a Commission Disbursement Authorization for
4 the Lake Blvd property. The Commission Disbursement Authorization provided instructions
5 for a check in the amount of \$2,600 to be sent to Respondent BECKETT, a check in the amount
6 of \$5,644 to be sent to BRIDGET MANZANARES, a check in the amount of \$476 to be sent to
7 Respondent CHRISTINE MEZA, and a check in the amount of \$400 to be sent to CASA
8 GRAN REAL ESTATE. The Commission Disbursement Authorization provided instructions
9 for the checks to be sent to 531 Encinitas Blvd, Suite 204, Encinitas, CA 92024. The header of
10 the Commission Disbursement Authorization included, "Flagship Real Estate Group". The
11 footer of the Commission Disbursement Authorization included, "DRE 02021350".

12 42.

13 On or about March 12, 2019, for the Lake Blvd property transaction, First
14 American Title Company made a check in the amount of \$2,600 to Respondent BECKETT, a
15 check in the amount of \$5,644 to Respondent BRIDGET MANZANARES, a check in the
16 amount of \$476 to Respondent CHRISTINE MEZA, a check in the amount of \$400 to
17 Respondent CASA GRAN REAL ESTATE, and a check in the amount of \$495 to Respondent
18 FLAGSHIP REAL ESTATE GROUP.

19 PURCHASE OF TURQUOISE ST PROPERTY

20 43.

21 On or about January 20, 2019, buyers N. Gerstein and W. Gerstein, represented
22 by broker Respondent FLAGSHIP REAL ESTATE GROUP through salesperson Respondent
23 ALLCORN-DOWNING, submitted an offer to purchase real property at
24 860 Turquoise St #328, San Diego, CA 92109 ("Turquoise St property") through a signed
25 Residential Purchase Agreement.

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44.

On or about January 23, 2019, Respondent MIGUEL MANZANARES signed a Commission Authorization on behalf of Respondent FLAGSHIP REAL ESTATE GROUP for the Turquoise St property. The Commission Authorization provided instructions for commission in the amount of \$7,875 to be paid to Respondent FLAGSHIP REAL ESTATE GROUP and Respondent ALLCORN-DOWNING.

45.

On or about January 31, 2019, Respondent MIGUEL MANZANARES and Respondent ALLCORN-DOWNING signed a Commission Disbursement Authorization for the Turquoise St property. MIGUEL MANZANARES signed the Commission Disbursement Authorization on behalf of Respondent FLAGSHIP REAL ESTATE GROUP. The Commission Disbursement Authorization provided instructions for a check in the amount of \$3,537.50 to be sent to ALLCORN-DOWNING and a check in the amount of \$3,937.50 to be sent to FLAGSHIP REAL ESTATE GROUP. The Commission Disbursement Authorization provided instructions for the checks to be sent to 531 Encinitas Blvd, Suite 204, Encinitas, CA 92024. The footer of the Commission Disbursement Authorization included, "DRE 02021350".

46.

On or about March 12, 2019, for the Turquoise St property transaction, SD County Escrow made a check in the amount of \$3,537.50 to Respondent ALLCORN-DOWNING and a check in the amount of \$3,937.50 to Respondent FLAGSHIP REAL ESTATE GROUP.

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1 PURCHASE OF LOMA ALTA DR PROPERTY

2 47.

3 On or about January 28, 2019, buyers A. Clark and M. Clark, represented by
4 broker Respondent FLAGSHIP REAL ESTATE GROUP through salesperson Respondent
5 MARQUEZ, submitted an offer to purchase real property at 219 Loma Alta Dr,
6 Oceanside, CA 92054 ("Loma Alta Dr property") through a signed Residential Purchase
7 Agreement.

8 48.

9 On or about February 28, 2019, the agent for the sellers of the Loma Alta Dr
10 property emailed Respondent MARQUEZ and Respondent BRIDGET MANZANARES with
11 the request, "please provide us with an addendum immediately clarifying your employing
12 brokerage situation, disclosing it to all parties of this transaction."

13 49.

14 On or about March 1, 2019, Respondent MIGUEL MANZANARES wrote a
15 letter for the Loma Alta Dr property. MIGUEL MANZANARES wrote, "I Miguel Manzanares
16 Broker of Flagship Real Estate Group hereby release commissions as per the CDA attached to
17 Casa Gran as Broker."

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1 50.

2 On or about March 4, 2019, Respondent MIGUEL MANZANARES and
3 Respondent CASA GRAN REAL ESTATE signed a Commission Disbursement Authorization
4 for the Loma Alta Dr property. MIGUEL MANZANARES signed the Commission
5 Disbursement Authorization on behalf of Respondent FLAGSHIP REAL ESTATE GROUP.
6 The Commission Disbursement Authorization provided instructions for a check in the amount
7 of \$6,400 to be sent to Respondent MARQUEZ, a check in the amount of \$6,800 to be sent to
8 Respondent BRIDGET MANZANARES, and a check in the amount of \$400 to be sent to
9 CASA GRAN REAL ESTATE. The Commission Disbursement Authorization provided
10 instructions for the checks to be sent to 531 Encinitas Blvd, Suite 204, Encinitas, CA 92024.
11 The header of the Commission Disbursement Authorization included, "Flagship Real Estate
12 Group". The footer of the Commission Disbursement Authorization included,
13 "DRE 02021350".

14 51.

15 On or about March 4, 2019, for the Loma Alta Dr property transaction, Power
16 Escrow, Inc. made a check in the amount of \$6,400 to Respondent MARQUEZ, a check in the
17 amount of \$6,800 to Respondent BRIDGET MANZANARES, and a check in the amount of
18 \$400 to Respondent CASA GRAN REAL ESTATE.

19 PURCHASE OF SHADYTREE LN PROPERTY

20 52.

21 On or about February 24, 2019, buyer B. Barnard, represented by broker
22 Respondent FLAGSHIP REAL ESTATE GROUP through salesperson Respondent ERWIN,
23 submitted an offer to purchase real property at 2018 Shadytree Ln, Encinitas, CA 92024
24 ("Shadytree Ln property") through a signed Residential Purchase Agreement.

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Cathy Veronica Allcorn-Downing, Bianca Raquel Marquez, Julie Ann Erwin, and Ruben Alberto Meza

1 53.

2 On or about February 28, 2019, Respondent CASA GRAN REAL ESTATE
3 signed an Instructions To Pay Commission for the Shadytree Ln property. The Instructions To
4 Pay Commission provided instructions for commission in the amount of \$17,012.50 to be paid
5 to Respondent FLAGSHIP REAL ESTATE GROUP.

6 54.

7 On or about March 21, 2019, Respondent BRIDGET MANZANARES signed a
8 Commission Disbursement Authorization for the Shadytree Ln property. The Commission
9 Disbursement Authorization provided instructions for a check in the amount of \$2,551 to be
10 sent to Respondent ERWIN, a check in the amount of \$13,651.50 to be sent to BRIDGET
11 MANZANARES, and a check in the amount of \$400 to be sent to CASA GRAN REAL
12 ESTATE. The Commission Disbursement Authorization provided instructions for the checks
13 to be sent to 531 Encinitas Blvd, Suite 204, Encinitas, CA 92024. The header of the
14 Commission Disbursement Authorization included, "Flagship Real Estate Group". The footer
15 of the Commission Disbursement Authorization included, "DRE 02021350".

16 55.

17 On or about March 29, 2019, for the Shadytree Ln property transaction, Coast
18 Cities Escrow made a check in the amount of \$2,551 to Respondent ERWIN, a check in the
19 amount of \$13,651.50 to Respondent BRIDGET MANZANARES, and a check in the amount
20 of \$400 to Respondent CASA GRAN REAL ESTATE.

21 SALE OF CALLE PULIDO PROPERTY

22 56.

23 On or about March 2, 2019, sellers A. Tiwary and S. Tiwary entered into a
24 Residential Listing Agreement with broker Respondent MIGUEL MANZANARES through
25 salesperson Respondent RUBEN MEZA to sell real property at 16576 Calle Pulido, San Diego,
26 CA 92128 ("Calle Pulido property").

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57.

On or about March 9, 2019, buyers E. Amcheslavsky and E. Leinov submitted an offer to purchase the Calle Pulido property through a signed Residential Purchase Agreement to Respondent CASA GRAN REAL ESTATE and Respondent RUBEN MEZA.

58.

On or about March 14, 2019, Respondent BRIDGET MANZANARES signed a Commission Instructions for the Calle Pulido property. The Commission Instructions provided instructions for commission in the amount of \$19,400 to be paid to Respondent CASA GRAN REAL ESTATE and Respondent RUBEN MEZA.

59.

On or about March 28, 2019, Respondent BRIDGET MANZANARES signed a Commission Disbursement Authorization for the Calle Pulido property. The Commission Disbursement Authorization provided instructions for a check in the amount of \$12,610 to be sent to Respondent RUBEN MEZA, a check in the amount of \$5,990 to be sent to BRIDGET MANZANARES, and a check in the amount of \$400 to be sent to CASA GRAN REAL ESTATE. The Commission Disbursement Authorization provided instructions for the checks to be sent to 531 Encinitas Blvd, Suite 204, Encinitas, CA 92024. The header of the Commission Disbursement Authorization included, "Flagship Real Estate Group". The footer of the Commission Disbursement Authorization included, "DRE 02021350".

60.

On or about April 10, 2019, for the Calle Pulido property transaction, New Venture Escrow made a check in the amount of \$12,610 to Respondent RUBEN MEZA, a check in the amount of \$5,990 to Respondent BRIDGET MANZANARES, and a check in the amount of \$400 to Respondent CASA GRAN REAL ESTATE.

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1 PURCHASE OF MELODIA TERRACE PROPERTY

2 61.

3 On or about April 3, 2019, buyer M. Burstein, represented by broker Respondent
4 CASA GRAN REAL ESTATE through salesperson Respondent BRIDGET MANZANARES,
5 submitted an offer to purchase real property at 7393 Melodia Terrace, Carlsbad, CA 92011
6 (“Melodia Terrace property”) through a signed Residential Purchase Agreement.

7 62.

8 On or about April 17, 2019, Respondent BRIDGET MANZANARES signed an
9 Amended Instructions To Pay Commission for the Melodia Terrace property. The Amended
10 Instructions To Pay Commission provided instructions for commission in the amount of
11 \$36,125 to be paid to Respondent CASA GRAN REAL ESTATE and Respondent BRIDGET
12 MANZANARES.

13 63.

14 On or about April 23, 2019, Respondent BRIDGET MANZANARES signed a
15 Commission Disbursement Authorization for the Melodia Terrace property. The Commission
16 Disbursement Authorization provided instructions for a check in the amount of \$35,225 to be
17 sent to BRIDGET MANZANARES and a check in the amount of \$400 to be sent to CASA
18 GRAN REAL ESTATE. The Commission Disbursement Authorization provided instructions
19 for the checks to be sent to 531 Encinitas Blvd, Suite 204, Encinitas, CA 92024. The header of
20 the Commission Disbursement Authorization included, “Flagship Real Estate Group”.

21 SALE AND PURCHASE OF EASTMONT PROPERTY

22 64.

23 On or about April 25, 2019, sellers G. Guerra and M. Mora entered into a
24 Residential Listing Agreement with broker Respondent MIGUEL MANZANARES through
25 salesperson Respondent RUBEN MEZA to sell real property at 516 Eastmont, Los Angeles,
26 CA 90022 (“Eastmont property”).

27 First Amended Accusation of Miguel Angel Manzanares, Flagship Real Estate Group, Casa Gran Real Estate Inc,
Katy Meyers, Bridget Rose Manzanares, Teresa Marie Beckett, Christine Ann Meza,
Cathy Veronica Allcorn-Downing, Bianca Raquel Marquez, Julie Ann Erwin, and Ruben Alberto Meza

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65.

On or about May 6, 2019, buyer M. Lam, represented by broker Respondent CASA GRAN REAL ESTATE through salesperson Respondent CHRISTINE MEZA, submitted an offer to purchase the Eastmont property through a signed Residential Purchase Agreement to CASA GRAN REAL ESTATE and Respondent RUBEN MEZA.

66.

On or about May 8, 2019, Respondent BRIDGET MANZANARES signed an Instructions To Pay Commission for the Eastmont property. The Instructions To Pay Commission provided instructions for commission in the amount of \$10,072.20 to be paid to Respondent CASA GRAN REAL ESTATE and Respondent CHRISTINE MEZA and commission in the amount of \$10,072.20 to be paid to CASA GRAN REAL ESTATE and Respondent RUBEN MEZA.

67.

On or about May 10, 2019, Respondent BRIDGET MANZANARES signed a Commission Disbursement Authorization for the Eastmont property. The Commission Disbursement Authorization provided instructions for a check in the amount of \$7,050.54 to be sent to Respondent CHRISTINE MEZA and a check in the amount of \$3,021.66 to be sent to BRIDGET MANZANARES. The Commission Disbursement Authorization provided instructions for the checks to be sent to 531 Encinitas Blvd, Suite 204, Encinitas, CA 92024. The header of the Commission Disbursement Authorization included, "Flagship Real Estate Group".

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First Amended Accusation of Miguel Angel Manzanares, Flagship Real Estate Group, Casa Gran Real Estate Inc, Katy Meyers, Bridget Rose Manzanares, Teresa Marie Beckett, Christine Ann Meza, Cathy Veronica Allcorn-Downing, Bianca Raquel Marquez, Julie Ann Erwin, and Ruben Alberto Meza

1 68.

2 On or about May 10, 2019, Respondent BRIDGET MANZANARES signed a
3 Commission Disbursement Authorization for the Eastmont property. The Commission
4 Disbursement Authorization provided instructions for a check in the amount of \$6,550.54 to be
5 sent to Respondent RUBEN MEZA, a check in the amount of \$2,621.66 to be sent to
6 BRIDGET MANZANARES, and a check in the amount of \$400 to be sent to Respondent
7 MEYERS. The Commission Disbursement Authorization provided instructions for the checks
8 to be sent to 531 Encinitas Blvd, Suite 204, Encinitas, CA 92024. The header of the
9 Commission Disbursement Authorization included, "Flagship Real Estate Group".

10 69.

11 On or about May 13, 2019, for the Eastmont property transaction, Glen Oaks
12 Escrow made a check in the amount of \$7,050.54 to Respondent CHRISTINE MEZA, a check
13 in the amount of \$3,021.66 to Respondent BRIDGET MANZANARES, a check in the amount
14 of \$2,621.66 to BRIDGET MANZANARES, a check in the amount of \$6,550.54 to
15 Respondent RUBEN MEZA, and a check in the amount of \$400 to Respondent MEYERS.

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27 First Amended Accusation of Miguel Angel Manzanares, Flagship Real Estate Group, Casa Gran Real Estate Inc,
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1 FIRST CAUSE OF ACTION

2 ENGAGING IN LICENSED ACTIVITY WITHOUT A VALID LICENSE,

3 BROKER AFFILIATION, OR DESIGNATED OFFICER

4 EMPLOYMENT OF SALESPERSON BY BROKER OTHER THAN BROKER OF RECORD

5 70.

6 The conduct, acts, and omissions of Respondents MIGUEL MANZANARES,
7 FLAGSHIP REAL ESTATE GROUP, CASA GRAN REAL ESTATE, BRIDGET
8 MANZANARES, BECKETT, CHRISTINE MEZA, ALLCORN-DOWNING, MARQUEZ,
9 ERWIN, and RUBEN MEZA, as described in Paragraphs 3 through 69 above, are in violation
10 of Code sections 10130 and 10137, and constitute cause under Code sections 10137, 10177(d),
11 10177(g), and/or 10177(j) for the suspension or revocation of all the licenses, license
12 endorsements, and license rights of MIGUEL MANZANARES, FLAGSHIP REAL ESTATE
13 GROUP, CASA GRAN REAL ESTATE, BRIDGET MANZANARES, BECKETT,
14 CHRISTINE MEZA, ALLCORN-DOWNING, MARQUEZ, ERWIN, and RUBEN MEZA, and
15 also constitute cause under Code section 10177(k) for the suspension or revocation of all the
16 licenses, license endorsements, and license rights of MIGUEL MANZANARES.

17 SECOND CAUSE OF ACTION

18 USE OF UNLICENSED FICTITIOUS BUSINESS NAME

19 71.

20 Respondents CASA GRAN REAL ESTATE and BRIDGET MANZANARES
21 used the unlicensed fictitious business name "Flagship Real Estate Group", as described in
22 Paragraphs 3 through 69 above, in violation of Code section 10159.5 and Regulations
23 section 2731, which constitutes cause for the suspension or revocation of all the licenses,
24 license rights, and license endorsements of CASA GRAN REAL ESTATE and BRIDGET
25 MANZANARES pursuant to the provisions of Code sections 10177(d) and/or 10177(g).

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27 First Amended Accusation of Miguel Angel Manzanares, Flagship Real Estate Group, Casa Gran Real Estate Inc,
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1 THIRD CAUSE OF ACTION

2 FAILURE TO INFORM COMMISSIONER OF BRANCH ADDRESS

3 72.

4 The conduct, acts, or omissions of Respondent CASA GRAN REAL ESTATE,
5 as described in Paragraphs 3 through 69 above, are in violation of Code section 10163 and
6 Regulations section 2715, and constitute cause under Code sections 10165, 10177(d),
7 and/or 10177(g) for the suspension or revocation of all the licenses, license endorsements, and
8 license rights of CASA GRAN REAL ESTATE.

9 FOURTH CAUSE OF ACTION

10 FAILURE TO SUPERVISE

11 73.

12 The conduct, acts, or omissions of Respondent MEYERS, as described in
13 Paragraphs 3 through 69 above, in failing to ensure compliance of the Real Estate Law by
14 Respondents CASA GRAN REAL ESTATE, BRIDGET MANZANARES, MARQUEZ, and
15 RUBEN MEZA, are in violation of Code section 10159.2 and Regulations section 2725 and
16 constitute cause under Code sections 10177(d), 10177(g), and/or 10177(h) for the suspension or
17 revocation of all the licenses and license rights of MEYERS.

18 74.

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

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27 First Amended Accusation of Miguel Angel Manzanares, Flagship Real Estate Group, Casa Gran Real Estate Inc,
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Cathy Veronica Allcorn-Downing, Bianca Raquel Marquez, Julie Ann Erwin, and Ruben Alberto Meza

1 WHEREFORE, Complainant prays that a hearing be conducted on the
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3 disciplinary action against all the licenses, license endorsements, and license rights of
4 Respondents MIGUEL ANGEL MANZANARES, FLAGSHIP REAL ESTATE GROUP,
5 CASA GRAN REAL ESTATE INC, KATY MEYERS, BRIDGET ROSE MANZANARES,
6 TERESA MARIE BECKETT, CHRISTINE ANN MEZA, CATHY VERONICA
7 ALLCORN-DOWNING, BIANCA RAQUEL MARQUEZ, JULIE ANN ERWIN, and RUBEN
8 ALBERTO MEZA under the Real Estate Law, for the cost of investigation and enforcement as
9 permitted by law, and for such other and further relief as may be proper under other applicable
10 provisions of law.

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12 Dated at San Diego, California

13 this 11 day of January, 2022

14
15 *Veronica Kilpatrick*

16 _____
17 Veronica Kilpatrick
18 Supervising Special Investigator

19 cc: MIGUEL ANGEL MANZANARES
20 FLAGSHIP REAL ESTATE GROUP
21 CASA GRAN REAL ESTATE INC
22 KATY MEYERS
23 BRIDGET ROSE MANZANARES
24 TERESA MARIE BECKETT
25 CHRISTINE ANN MEZA
26 CATHY VERONICA ALLCORN-DOWNING
27 BIANCA RAQUEL MARQUEZ
 JULIE ANN ERWIN
 RUBEN ALBERTO MEZA
 R-MAC Properties Inc
 Turner Real Estate Inc
 Dave Stubbs Real Estate Inc
 Veronica Kilpatrick

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Cathy Veronica Allcorn-Downing, Bianca Raquel Marquez, Julie Ann Erwin, and Ruben Alberto Meza

Sacto.

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**First Amended Accusation of Miguel Angel Manzanares, Flagship Real Estate Group, Casa Gran Real Estate Inc,
Katy Meyers, Bridget Rose Manzanares, Teresa Marie Beckett, Christine Ann Meza,
Cathy Veronica Allcorn-Downing, Bianca Raquel Marquez, Julie Ann Erwin, and Ruben Alberto Meza**