1			FILED
2	ж. ў.		JUL 0 7 2022
3	-		DEPT. OF REAL ESTATE By
4			By @//////
5			
6			
7			
8	BEFORE THE DEPARTMEN	ΤC	OF REAL ESTATE
9	STATE OF CALI	FO	RNIA
10	***		
11	In the Matter of the Accusation of	)	No. H-05234 SD
12	MIGUEL ANGEL MANZANARES,	)	STIPULATION AND AGREEMENT
13	individually and as designated officer of Flagship Real Estate Group,	) )	
14	<u>FLAGSHIP REAL ESTATE GROUP,</u> CASA GRAN REAL ESTATE INC,	)	
15	doing business as Padre Mortgage,	)	
16	KATY MEYERS, individually and as designated officer of	) )	
17	Casa Gran Real Estate Inc, BRIDGET ROSE MANZANARES,	)	
18	TERESA MARIE BECKETT,	)	
19	CHRISTINE ANN MEZA, CATHY VERONICA ALLCORN-DOWNING,	) )	
20	BIANCA RAQUEL MARQUEZ, JULIE ANN ERWIN, and	)	
21	RUBEN ALBERTO MEZA,	)	
22	Respondents.	) )	
23		)	
24	It is hereby stipulated by and between	Re	espondent MIGUEL ANGEL
25	MANZANARES and Respondent FLAGSHIP REA	ĹΕ	STATE GROUP, individually and as
26	designated officer of Flagship Real Estate Group ("Respondents"), and the Complainant, acting		
27	by and through Steve Chu, Counsel for the Departme	ent	of Real Estate ("Department"), as
	-1-		

follows for the purpose of settling and disposing of the Accusation filed on June 10, 2021, and
the First Amended Accusation filed on January 12, 2022, ("Accusation") in this matter:

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

8 2. Respondents have received, read, and understand the Statement to
 9 Respondent, the Discovery Provisions of the APA, and the Accusation filed by the Department
 10 of Real Estate in this proceeding.

11 3. On June 23, 2021, Respondents filed Notices of Defense pursuant to section 11506 of the Government Code for the purpose of requesting a hearing on the 12 13 allegations in the Accusation. Respondents hereby freely and voluntarily withdraw said Notices of Defense. Respondents acknowledge that Respondents understand that by withdrawing said 14 15 Notices of Defense, Respondents will thereby waive Respondents' right to require the Real Estate Commissioner ("Commissioner") to prove the allegations in the Accusation at a 16 17 contested hearing held in accordance with the provisions of the APA and that Respondents will waive other rights afforded to Respondents in connection with the hearing such as the right to 18 19 present evidence in defense of the allegations in the Accusation and the right to cross-examine 20 witnesses.

4. Respondents, pursuant to the limitations set forth below, hereby admit
 that the factual allegations in the Accusation filed in this proceeding are true and correct and the
 Commissioner shall not be required to provide further evidence to prove such allegations.
 ///

- 25 ///
- 26 ///
- 27 ///

1	5. It is understood by the parties that the Real Estate Commissioner may
2	adopt the Stipulation as his Decision in this matter, thereby imposing the penalty and sanctions
3	on Respondents' real estate licenses and license rights as set forth in the below Order. In the
4	event that the Commissioner in his discretion does not adopt the Stipulation, it shall be void
5	and of no effect, and Respondents shall retain the right to a hearing and proceeding on the
6	Accusation under all the provisions of the APA and shall not be bound by any admission or
7	waiver made herein.
8	6. The Order or any subsequent Order of the Commissioner made pursuant
9	to this Stipulation shall not constitute an estoppel, merger or bar to any further administrative or
10	civil proceedings by the Department with respect to any matters which were not specifically
11	alleged to be causes for the Accusation in this proceeding.
12	DETERMINATION OF ISSUES
13	By reason of the foregoing stipulations, admissions, and waivers, and solely for
14	the purpose of settlement of the pending Accusation without a hearing, it is stipulated and
15	agreed that the following Determination of Issues shall be made:
16	Ι.
17	The conduct, acts, and/or omissions of Respondent MIGUEL ANGEL
	The conduct, acts, and/or omissions of Respondent MIGUEL ANGEL MANZANARES, as described in the Accusation, are in violation of California Business and
17	
17 18	MANZANARES, as described in the Accusation, are in violation of California Business and
17 18 19	MANZANARES, as described in the Accusation, are in violation of California Business and Professions Code ("Code") sections 10130 and 10137, and constitute cause for the suspension
17 18 19 20	MANZANARES, as described in the Accusation, are in violation of California Business and Professions Code ("Code") sections 10130 and 10137, and constitute cause for the suspension or revocation of all real estate licenses, license endorsements, and license rights of Respondent
17 18 19 20 21	MANZANARES, as described in the Accusation, are in violation of California Business and Professions Code ("Code") sections 10130 and 10137, and constitute cause for the suspension or revocation of all real estate licenses, license endorsements, and license rights of Respondent MIGUEL ANGEL MANZANARES under Code sections 10137, 10177(d), 10177(g), 10177(j)
17 18 19 20 21 22	MANZANARES, as described in the Accusation, are in violation of California Business and Professions Code ("Code") sections 10130 and 10137, and constitute cause for the suspension or revocation of all real estate licenses, license endorsements, and license rights of Respondent MIGUEL ANGEL MANZANARES under Code sections 10137, 10177(d), 10177(g), 10177(j) and 10177(k).
17 18 19 20 21 22 23	MANZANARES, as described in the Accusation, are in violation of California Business and Professions Code ("Code") sections 10130 and 10137, and constitute cause for the suspension or revocation of all real estate licenses, license endorsements, and license rights of Respondent MIGUEL ANGEL MANZANARES under Code sections 10137, 10177(d), 10177(g), 10177(j) and 10177(k). ///
17 18 19 20 21 22 23 24	MANZANARES, as described in the Accusation, are in violation of California Business and Professions Code ("Code") sections 10130 and 10137, and constitute cause for the suspension or revocation of all real estate licenses, license endorsements, and license rights of Respondent MIGUEL ANGEL MANZANARES under Code sections 10137, 10177(d), 10177(g), 10177(j) and 10177(k). ///
17 18 19 20 21 22 23 24 25	MANZANARES, as described in the Accusation, are in violation of California Business and Professions Code ("Code") sections 10130 and 10137, and constitute cause for the suspension or revocation of all real estate licenses, license endorsements, and license rights of Respondent MIGUEL ANGEL MANZANARES under Code sections 10137, 10177(d), 10177(g), 10177(j) and 10177(k). /// ///
17 18 19 20 21 22 23 24 25 26	MANZANARES, as described in the Accusation, are in violation of California Business and Professions Code ("Code") sections 10130 and 10137, and constitute cause for the suspension or revocation of all real estate licenses, license endorsements, and license rights of Respondent MIGUEL ANGEL MANZANARES under Code sections 10137, 10177(d), 10177(g), 10177(j) and 10177(k). /// ///
17 18 19 20 21 22 23 24 25 26	MANZANARES, as described in the Accusation, are in violation of California Business and Professions Code ("Code") sections 10130 and 10137, and constitute cause for the suspension or revocation of all real estate licenses, license endorsements, and license rights of Respondent MIGUEL ANGEL MANZANARES under Code sections 10137, 10177(d), 10177(g), 10177(j) and 10177(k). /// ///

1	II.		
2	The conduct, acts, and/or omissions of Respondent FLAGSHIP REAL ESTATE		
3	GROUP, as described in the Accusation, are in violation of Code sections 10130 and 10137,		
4	and constitute cause for the suspension or revocation of all real estate licenses, license		
5	endorsements, and license rights of Respondent FLAGSHIP REAL ESTATE GROUP under		
6	Code sections 10137, 10177(d), 10177(g), and 10177(j).		
7	ORDER		
8	м <u>I.</u>		
9	All licenses and licensing rights of Respondent MIGUEL ANGEL		
10	MANZANARES under the Real Estate Law are revoked; provided, however, a restricted real		
11	estate broker license and restricted real estate designated officer license shall be issued to		
12	Respondent pursuant to Section 10156.5 of the Code if Respondent makes application therefor		
13	and pays to the Department the appropriate fee for the restricted license within ninety (90) days		
14	from the effective date of this Decision. The restricted license issued to Respondent shall be		
15	subject to all of the provisions of Section 10156.7 of the Code and to the following limitations,		
16	conditions, and restrictions imposed under Section 10156.6 of the Code:		
17	1. The restricted license issued to Respondent may be suspended prior to		
18	hearing by Order of the Real Estate Commissioner in the event of Respondent's conviction,		
19	plea of guilty, or plea of nolo contendere to a crime which is substantially related to		
20	Respondent's fitness or capacity as a real estate licensee.		
21	2. The restricted license issued to Respondent may be suspended prior to		
22	hearing by Order of the Real Estate Commissioner on evidence satisfactory to the		
23	Commissioner that Respondent has violated provisions of the California Real Estate Law, the		
24	Subdivided Lands Law, Regulations of the Real Estate Commissioner, or the conditions		
25	attaching to this restricted license.		
26	///		
27	///		

- 4 -

1 3. Respondent shall not be eligible to apply for the issuance of an 2 unrestricted real estate license, including designated officer or mortgage loan originator 3 endorsement, nor for the removal of any of the conditions, limitations or restrictions of a restricted license until four (4) years have elapsed from the effective date of this Decision and 4 5 Order. Respondent withdraws all pending license applications. 6 4. All licenses and licensing rights of Respondent MIGUEL ANGEL 7 MANZANARES are indefinitely suspended unless or until Respondent MIGUEL ANGEL 8 MANZANARES pays, jointly and severally with Respondent FLAGSHIP REAL ESTATE 9 GROUP, the sum of \$11,489.35 for the Commissioner's reasonable cost of the investigation 10 and enforcement which led to this disciplinary action. Said payment shall be in the form of a 11 cashier's check made payable to the Department of Real Estate. The investigative and 12 enforcement costs must be delivered to the Department of Real Estate, Flag Section at 13 P.O. Box 137013, Sacramento, CA 95813-7013, prior to the effective date of this Decision and 14 Order. 15 II. 16 All licenses and licensing rights of Respondent FLAGSHIP REAL ESTATE 17 GROUP under the Real Estate Law are revoked; provided, however, a restricted corporate real 18 estate broker license shall be issued to Respondent pursuant to Section 10156.5 of the Code if 19 Respondent makes application therefor and pays to the Department the appropriate fee for the 20 restricted license within ninety (90) days from the effective date of this Decision. The restricted 21 license issued to Respondent shall be subject to all of the provisions of Section 10156.7 of the 22 Code and to the following limitations, conditions, and restrictions imposed under Section 10156.6 of the Code: 23 24 1. The restricted license issued to Respondent may be suspended prior to 25 hearing by Order of the Real Estate Commissioner in the event of Respondent's conviction, 26 plea of guilty, or plea of nolo contendere to a crime which is substantially related to 27 Respondent's fitness or capacity as a real estate licensee.

- 5 -

2. The restricted license issued to Respondent may be suspended prior to
 hearing by Order of the Real Estate Commissioner on evidence satisfactory to the
 Commissioner that Respondent has violated provisions of the California Real Estate Law, the
 Subdivided Lands Law, Regulations of the Real Estate Commissioner, or the conditions
 attaching to this restricted license.

3. Respondent shall not be eligible to apply for the issuance of an
unrestricted real estate license, including designated officer or mortgage loan originator
endorsement, nor for the removal of any of the conditions, limitations or restrictions of a
restricted license until four (4) years have elapsed from the effective date of this Decision and
Order. Respondent withdraws all pending license applications.

11 4. All licenses and licensing rights of Respondent FLAGSHIP REAL 12 ESTATE GROUP are indefinitely suspended unless or until Respondent FLAGSHIP REAL 13 ESTATE GROUP pays, jointly and severally with Respondent MIGUEL ANGEL 14 MANZANARES, the sum of \$11,489.35 for the Commissioner's reasonable cost of the 15 investigation and enforcement which led to this disciplinary action. Said payment shall be in 16 the form of a cashier's check made payable to the Department of Real Estate. The investigative 17 and enforcement costs must be delivered to the Department of Real Estate, Flag Section at P.O. Box 137013, Sacramento, CA 95813-7013, prior to the effective date of this Decision and 18 19 Order.

20 21 22 111 23 111 24 111 25 /// 26 27 ///

DATED: 5-25-2022

Steve Chu, Counsel Department of Real Estate

We have read the Stipulation and Agreement. We understand that we are waiving rights given to us by the California Administrative Procedure Act, (including but not limited to sections 11521 and 11523 of the Government Code), and we willingly, intelligently, and voluntarily waive those rights, including the right to seek reconsideration and the right to seek judicial review of the Commissioner's Decision and Order by way of a writ of mandate.

7 We agree, acknowledge, and understand that we cannot rescind or amend this Stipulation and Agreement. 8

9 We can signify acceptance and approval of the terms and conditions of this 10 Stipulation and Agreement by mailing the original signed Stipulation and Agreement to: 11 Steve Chu, Department of Real Estate, 320 West 4th Street, Suite 350, Los Angeles, 12 California 90013-1105. Steve Chu must receive the original signed Stipulation and Agreement 13 or a copy faxed to (213) 576-6917 by May 31, 2022; if not, this Stipulation and Agreement is 14 invalid and void because the sum for the Commissioner's reasonable cost of the investigation 15 and enforcement which led to this disciplinary action will increase.

16 5/19/22 17 DATED: 18 19 DATED:

1

2

3

4

5

6

20

21

22

23

24

25

26

27

111

111

111

111

ANGEL MANZANARES Respondent

AGSHIP REAL ESTATE GROUP Respondent By MIGUEL ANGEL MANZANARES, as designated officer of Flagship Real Estate Group

1	* * *
2	The foregoing Stipulation and Agreement is hereby adopted by me as my
3	Decision in this matter as to Respondent MIGUEL ANGEL MANZANARES and Respondent
4	FLAGSHIP REAL ESTATE GROUP, and shall become effective at 12 o'clock noon on
5	7127 2022
6	IT IS SO ORDERED CP. 17. 22
7	DOUGLAS R. McCAULEY
8	REAL ESTATE COMMISSIONER
9	Dough D Mul. 10-
10	Dougst. menon
11	,
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	

- 8 -

11