

1 Department of Real Estate  
2 320 West 4th Street, Ste. 350  
3 Los Angeles, California 90013-1105  
4 Telephone: (213) 576-6982

FILED

SEP 29 2025

DEPT OF REAL ESTATE

By \_\_\_\_\_

7 BEFORE THE DEPARTMENT OF REAL ESTATE  
8

9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation against ) No. H-05276 SD

12 )  
13 AMERICAN DREAM CORPORATION ) **STIPULATION**  
14 ) AND  
15 and ) AGREEMENT

16 MAMADY BINTA CISSE, )

17 )  
18 ) Respondents. )

19 It is hereby stipulated by and between Respondent MAMADY BINTA CISSE  
20 (Respondent, and the Complainant, acting by and through Julie L. To, Counsel for the  
21 Department of Real Estate (“Department” or “DRE”), as follows for the purpose of settling and  
22 disposing of the Accusation filed on February 8, 2022 in Department of Real Estate Case No.  
23 H-05276 SD, in this matter.

24 1. All issues which were to be contested and all evidence which was to be  
25 presented by Complainant and Respondent at a formal hearing on the Accusation (Accusation),  
26 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

27 H-05276 SD - Stipulation & Agreement: Mamady Binta Cisse

1 of this Stipulation and Agreement (Stipulation).

2           2.        Respondent has received, read, and understand the Statement to  
3        Respondent, the Discovery Provisions of the APA and the Accusation filed by the Department of  
4        Real Estate in this proceeding.

5           3.       On or about March 17, 2022, Respondent timely filed their Notice of  
6       Defense pursuant to Section 11505 of the Government Code for the purpose of requesting a  
7       hearing on the allegations in the Accusation. Respondent hereby freely and voluntarily  
8       withdraws said Notice of Defense. Respondent acknowledges that they understand that by  
9       withdrawing said Notice of Defense they thereby waive their right to require the Real Estate  
10      Commissioner (Commissioner) to prove the allegations in the Accusation at a contested hearing  
11      held in accordance with the provisions of the APA, and that they will waive other rights afforded  
12      to them in connection with the hearing such as the right to present evidence in their defense of  
13      the allegations in the Accusation and the right to cross-examine witnesses.

14       4.       This Stipulation is based on the factual allegations contained in the  
15       Accusation. In the interest of expediency and economy, Respondent chooses not to contest these  
16       factual allegations, but to remain silent and understands that, as a result thereof, these factual  
17       allegations, without being admitted or denied, will serve as a *prima facie* basis for the  
18       disciplinary action stipulated to herein. The Commissioner shall not be required to provide  
19       further evidence to prove such allegations.

20       5.     This Stipulation and Respondent's decision not to contest the Accusation  
21     are made for the purpose of reaching an agreed disposition of this proceeding and are expressly  
22     limited to this proceeding and any other proceeding or case in which the Department, the state or  
23     federal government, an agency of this state, or an agency of another state is involved, and shall  
24     not be otherwise admissible in any other criminal or civil procedure. Respondent further  
25     understands that the sustained violation(s) may be considered in any future administrative or

1 disciplinary matters by the Department.

2       6. It is understood by the parties that the Commissioner may adopt this  
3 Stipulation as the Commissioner's Decision in this matter, thereby imposing the penalty and  
4 sanctions on Respondent's real estate licenses and license rights as set forth in the "Order"  
5 below. In the event that the Commissioner in his discretion does not adopt the Stipulation and  
6 Agreement, the Stipulation shall be void and of no effect, and Respondent shall retain the right to  
7 a hearing and proceeding on the Accusation under the provisions of the APA and shall not be  
8 bound by any admission or waiver made herein.

9       7. The Order or any subsequent Order of the Commissioner made pursuant to  
10 this Stipulation shall not constitute an estoppel, merger, or bar to any further administrative or  
11 civil proceedings by the Department with respect to any matters which were not specifically  
12 alleged to be causes for Accusation in this proceeding but do constitute a bar, estoppel and  
13 merger as to any allegations actually contained in the Accusation against Respondent herein.

14       8. Respondent understands that by agreeing to this Stipulation and pursuant  
15 to Code Section 10106, Respondent agrees to pay for their portion of the cost of the investigation  
16 and enforcement costs (investigative costs) which resulted in the determination that Respondent  
17 committed the violations found in the Determination of Issues. The amount of said investigative  
18 costs is \$4,403.20; therefore, Respondent agree to pays, pursuant to Code Section 10106, his  
19 one-half portion of said costs, in the amount \$2,201.60.

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## DETERMINATION OF ISSUES

2 By reason of the foregoing stipulations, admissions and waivers, and solely for  
3 the purpose of settlement of the pending Accusation without a hearing, it is stipulated and agreed  
4 that the following determination of issues shall be made:

The conduct, acts or omissions of Respondent MAMADY BINTA CISSE, as described in Paragraph 4, herein above, are in violation of the Real Estate Law pursuant to Code Section 10159.2 and Regulation 2725, and are bases for the suspension or revocation of the license and license rights of Respondent under the provisions of Code Section 10177(h).

## ORDER

10 WHEREFORE, THE FOLLOWING ORDER is hereby made:

1.

12 All licenses and licensing rights of Respondent MAMADY BINTA CISSE under  
13 the Real Estate Law are suspended for a period of ninety (90) days from the effective date of this  
14 Decision and Order; provided, however, that all ninety (90) days of said suspension shall be  
15 stayed for one (1) year upon the following terms and conditions:

16                   1. Respondent shall obey all laws, rules and regulations governing the rights,  
17                   duties and responsibilities of a real estate licensee in the State of California.

18 2. No further cause for disciplinary action against the real estate licenses  
19 of Respondent occurs within one (1) year from the effective date of the Decision in this matter. If  
20 no further cause for disciplinary action against the real estate licenses of Respondent occurs  
21 within one (1) year from the effective date of the Decision, the stay hereby granted shall become  
22 permanent.

23                   3. All licenses and licensing rights of all Respondents are indefinitely suspended  
24 unless or until Respondent pays the sum of \$2,201.60 for the Commissioner's reasonable cost of  
25 the investigation and enforcement which led to this disciplinary action. Respondent agrees to

1 pay said investigation and enforcement costs. Respondent's payment shall be in the form of a  
2 cashier's check or certified check made payable to the Department of Real Estate. The  
3 investigation and enforcement costs must be delivered to the Department of Real Estate, Flag  
4 Section at 651 Bannon Street, Suite 504, Sacramento, CA 95811, prior to the effective date of  
5 this Decision and Order.

6 08-21-25  
7 DATED: \_\_\_\_\_

8 [REDACTED]  
9 Julie L. To,  
10 Counsel for Complainant Department of Real Estate

11 \* \* \*

12 II.

13 EXECUTION OF THE STIPULATION

14 I have read the Stipulation and Agreement. Its terms are understood by me and  
15 are agreeable and acceptable to me. I understand that I am waiving rights given to me by the  
16 California Administrative Procedure Act (including but not limited to Sections 11506, 11508,  
17 11509 and 11513 of the Government Code), and I willingly, intelligently and voluntarily waive  
18 those rights, including the right of requiring the Commissioner to prove the allegations in the  
19 Accusation at a hearing at which I would have the right to cross-examine witnesses against us  
20 and to present evidence in defense and mitigation of the charges.

21 III.

22 MAILING AND FACSIMILE

23 Respondent can signify acceptance and approval of the terms and conditions of  
24 this Stipulation and Agreement by sending a hard copy of the original signed signature page of  
25 the Stipulation herein to Julie L. To, Legal Section, Department of Real Estate, 320 W. Fourth  
26 St., Suite 350, Los Angeles, California 90013-1105. In the event of time constraints before an  
27 administrative hearing, Respondent can signify acceptance and approval of the terms and

1 conditions of this Stipulation and Agreement by e-mailing a scanned copy of the signature page,  
2 as actually signed by Respondent, to the Department counsel assigned to this case. Respondent  
3 agrees, acknowledges, and understands that by electronically sending to the Department a scan  
4 of Respondent's actual signature as they appear on the Stipulation and Agreement, that receipt of  
5 the scan by the Department shall be binding on Respondent as if the Department had received the  
6 original signed Stipulation and Agreement.

7  
8 DATED: 08/11/2025

9 [REDACTED]  
10  
11 MAMADY BINTA CISSE, Respondent

12  
13 The foregoing Stipulation and Agreement is hereby adopted as my Decision as to  
14 Respondent MAMADY BINTA CISSE, and shall become effective at 12 o'clock noon on  
15 OCT 29 2025, 2024.

16 IT IS SO ORDERED

17  
18 CHIKA SUNQUIST  
19 REAL ESTATE COMMISSIONER  
20 [REDACTED]

21 By: Marcus L. McCarther  
22 Deputy Real Estate Commissioner