



1 hearing was to be held in accordance with the provisions of the Administrative Procedure Act  
2 (“APA”), shall instead and in place thereof be submitted solely on the basis of the provisions of  
3 this Stipulation and Agreement (“Stipulation”).

4               2. Respondents have received, read and understand the Statement to Respondent,  
5 the Discovery Provisions of the APA and the Accusation filed by the Department of Real Estate  
6 (“Department”) in this proceeding.

7               3. Respondents filed a Notice of Defense pursuant to Section 11506 of the  
8 Government Code for the purpose of requesting a hearing on the allegations in the Accusation.  
9 Respondents hereby freely and voluntarily withdraw said Notice of Defense. Respondents  
10 acknowledge that they understand that by withdrawing said Notice of Defense they thereby  
11 waive their right to require the Commissioner to prove the allegations in the Accusation at a  
12 contested hearing held in accordance with the provisions of the APA and that they will waive  
13 other rights afforded to them in connection with the hearing such as the right to present evidence  
14 in their defense, and the right to cross-examine witnesses.

15              4. This Stipulation is based on the factual allegations contained in the Accusation  
16 filed in this proceeding. In the interest of expedience and economy, Respondents choose not to  
17 contest these factual allegations, but to remain silent and understand that, as a result thereof,  
18 these factual statements, will serve as a prima facie basis for the disciplinary action stipulated to  
19 herein. The Real Estate Commissioner shall not be required to provide further evidence to prove  
20 such allegations.

21              5. This Stipulation is made for the purpose of reaching an agreed disposition of  
22 this proceeding and is expressly limited to this proceeding and not any other proceeding or case  
23 in which the Department, or another licensing agency of this state, another state, or the federal  
24 government is involved, and otherwise shall not be admissible in any criminal or civil  
25 proceeding.

26              6. It is understood by the parties that the Real Estate Commissioner may adopt  
27 this Stipulation as her Decision in this matter thereby imposing the penalty and sanctions on

1 Respondents' real estate licenses and license rights as set forth in the below "Order." In the  
2 event that the Commissioner in her discretion does not adopt the Stipulation, the Stipulation shall  
3 be void and of no effect and Respondents shall retain the right to a hearing and proceed on the  
4 Accusation under the provisions of the APA and shall not be bound by any stipulation or waiver  
5 made herein.

6 7. The Order or any subsequent Order of the Real Estate Commissioner made  
7 pursuant to this Stipulation shall not constitute an estoppel, merger or bar to any further  
8 administrative or civil proceedings by the Department with respect to any matters which were  
9 not specifically alleged to be causes for accusation in this proceeding.

10 **DETERMINATION OF ISSUES**

11 By reason of the foregoing, and solely for the purpose of settlement of the  
12 pending Accusation without a hearing, it is stipulated and agreed that the following  
13 Determination of Issues shall be made:

14 The conduct, acts or omissions of Respondent MARDOLLA GROUP, INC., as  
15 set forth in the Accusation, are in violation of California Business and Professions Code  
16 ("Code") sections 10130, 10145(a), 10176(e), and 10176(g) and Sections 2832.1 and 2835 of  
17 Title 10, Chapter 6 of the California Code of Regulations ("Regulation") and are a basis for  
18 discipline of Respondent MARDOLLA GROUP, INC.'s licenses and licensing rights pursuant to  
19 Code sections 10177(d) and/or 10177(g).

20 The conduct, acts or omissions of Respondent DOJ C. LLAMAS, as set forth in  
21 the Accusation, are in violation of Code section 10159.2 and Regulation section 2725 and are a  
22 basis for discipline of Respondent DOJ C. LLAMAS' licenses and licensing rights pursuant to  
23 Code sections 10177(d), 10177(g), and/or 10177(h).

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1 condition.

2 (SUBSEQUENT AUDIT COSTS)

3 III.

4 Pursuant to Code section 10148, Respondent MARDOLLA GROUP, INC. shall  
5 pay the Commissioner's reasonable costs, not to exceed **\$4,393.75**, for a subsequent audit to  
6 determine if Respondent MARDOLLA GROUP, INC. has corrected the violations found in the  
7 Determination of Issues. In calculating the amount of the Commissioner's reasonable costs, the  
8 Commissioner may use the estimated average hourly salary for all persons performing audits of  
9 real estate brokers, and shall include an allocation for travel time to and from the auditor's place  
10 of work. Respondent MARDOLLA GROUP, INC. shall pay such costs within sixty (60) days of  
11 receiving an invoice therefor from the Commissioner. If Respondent MARDOLLA GROUP,  
12 INC. fails to satisfy this condition in a timely manner as provided for herein, Respondent's real  
13 estate licenses shall automatically be suspended until payment is made in full, or until a decision  
14 providing otherwise is adopted following a hearing held pursuant to this condition.

15 (INVESTIGATION AND ENFORCEMENT COSTS)

16 IV.

17 All licenses and license rights of Respondents MARDOLLA GROUP, INC. and  
18 DOJ I. LLAMAS are indefinitely suspended, unless or until Respondents pay, jointly and  
19 severally, the sum of **\$2,926.70** for the Commissioner's reasonable costs of the investigation and  
20 enforcement that led to this disciplinary action. Said payment shall be in the form of a cashier's  
21 check made payable to the Department of Real Estate. The investigative and enforcement costs  
22 must be delivered to the Department of Real Estate, Flag Section at 651 Bannon Street, Suite  
23 504, Sacramento, CA 95811, **prior to the effective date of this Decision and Order**. Payment  
24 of investigation and enforcement costs should not be made until the Stipulation has been  
25 approved by the Commissioner.

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(TRUST FUND HANDLING COURSE)

V.

Respondent DOJI C. LLAMAS shall, within nine (9) months from the effective date of this Decision and Order, present evidence satisfactory to the Real Estate Commissioner that he has, since the most recent issuance of an original or renewal real estate license, taken and successfully completed the continuing education course on trust fund accounting and handling specified in paragraph (3) of subdivision (a) of Code Section 10170.5. If Respondent DOJI C. LLAMAS fails to satisfy this condition, Respondent DOJI C. LLAMAS' real estate license shall be automatically suspended until he presents evidence satisfactory to the Commissioner of having taken and successfully completed the trust fund accounting and handling course. Proof of completion of the continuing education course must be delivered to the Department of Real Estate, Flag Section, 651 Bannan Street, Suite 504, Sacramento, CA 95811.

DATED: 08/01/2024

Kathy Yi, Counsel for  
Department of Real Estate

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**EXECUTION OF THE STIPULATION**

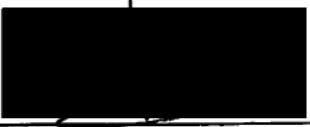
Respondents have read the Stipulation, have discussed it with their counsel, and its terms are understood by Respondents and are agreeable and acceptable to Respondents. Respondents understand that Respondents are waiving rights given to them by the California Administrative Procedure Act (including but not limited to Sections 11506, 11508, 11509 and 11513 of the Government Code), and Respondents willingly, intelligently and voluntarily waive those rights, including the right of requiring the Commissioner to prove the allegations in the Accusation at a hearing at which Respondents would have the right to cross-examine witnesses against them and to present evidence in defense and mitigation of the charges.

Respondents agree, acknowledge, and understand that Respondents cannot rescind or amend this Stipulation and Agreement. By signing this Stipulation, Respondents

1 understand and agree that Respondents may not withdraw Respondents' agreement or seek to  
2 rescind the Stipulation prior to the time the Commissioner considers and acts upon it or prior to  
3 the effective date of the Stipulation and Order.

4 Respondents can signify acceptance and approval of the terms and conditions of  
5 this Stipulation and Agreement by electronically e-mailing a copy of the signature page, as  
6 actually signed by Respondents, to the Department. Respondents agree, acknowledge, and  
7 understand that by electronically sending to the Department an electronic copy of Respondents'  
8 actual signatures, as they appear on the Stipulation, that receipt of the emailed copy by the  
9 Department shall be as binding on Respondents as if the Department had received the original  
10 signed Stipulation. Alternatively, Respondents can signify acceptance and approval of the terms  
11 and conditions of this Stipulation and Agreement by mailing the original signed Stipulation and  
12 Agreement to: Kathy Yi, Department of Real Estate, 320 West 4th Street, Suite 350, Los  
13 Angeles, California 90013-1105.

14  
15 Dated: Aug 1, 2024

16   
17 MARDOLLA GROUP, INC.  
18 Respondent  
19 By: 

20 Dated: Aug 1, 2024

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22 DOJI C. LLAMAS  
23 Respondent

24 Dated: 8/1/2024

25   
26 Joshua A. Rosenthal, Esq.  
27 Counsel for Respondents  
Approved as to Form

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1 The foregoing Stipulation and Agreement is hereby adopted as my Decision as to  
2 Respondents MARDOLLA GROUP, INC. and DOJI C. LLAMAS, individually and as  
3 Designated Officer of MARDOLLA GROUP, Inc., and shall become effective at 12 o'clock  
4 noon on 10/15/2024.

5 IT IS SO ORDERED

9/16/2024

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7 CHIKA SUNQUIST  
8 REAL ESTATE COMMISSIONER



11 By: MARCUS L. McCARTHER  
12 Chief Deputy Real Estate Commissioner  
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