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9	BEFORE THE DEPARTMENT OF REAL ESTATE
10	STATE OF CALIFORNIA
. 10	STATE OF CALIFORNIA
11	
)
13	ANTONIA HENRIETTA PAPADATOS,) <u>FIRST AMENDED</u>
14	Respondent.
15)
16	This Accusation amends the Accusation filed on April 27, 2018. The
17	Complainant, Maria Suarez, a Supervising Special Investigator of the State of California, for
18	cause of Accusation against ANTONIA HENRIETTA PAPADATOS, a.k.a. ANTONIA
19	HENRIETA PAPADATOS ("Respondent"), is informed and alleges as follows:
20	1.
21	The Complainant, Maria Suarez, acting in her official capacity as a Supervising
22	Special Investigator of the State of California, makes this Accusation against ANTONIA
23	HENRIETTA PAPADATOS.
24	2.
25	Alwayzz Inc presently has license rights under the Real Estate Law, Part 1 of
26	Division 4 of the California Business and Professions Code ("Code"), as a corporate real estate
27	broker.
	Accusation of Antonia Henrietta Papadatos
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	5.
2	Respondent ANTONIA HENRIETTA PAPADATOS presently has license
3	rights as a real estate broker. Respondent also has an individual mortgage loan originator
4	license endorsement. Respondent also presently has license rights as a designated officer of
5	Alwayzz Inc.
6	(PRIOR LICENSE DISCIPLINE)
7	4.
8	In aggravation, on or about May 23, 2013, the Department of Real Estate filed an
9	Accusation against Alwayzz Inc and Respondent ANTONIA HENRIETTA PAPADATOS in
10	Case No. H-38887 LA. On or about June 16, 2014, Alwayzz Inc, Respondent ANTONIA
11	HENRIETTA PAPADATOS, and the Department of Real Estate entered into a Stipulation and
12	Agreement in Case No. H-38887 LA, effective on or about August 26, 2014, where
13	Alwayzz Inc and Respondent ANTONIA HENRIETTA PAPADATOS stipulated to the acts
14	and omissions in the Accusation as grounds for disciplinary action in that: Alwayzz Inc
15	violated Code sections 10140.6, 10145, and 10159.5, and Title 10, Chapter 6, California Code
16	of Regulations ("Regulations") sections 2832.1, 2834, 2840, 2773, and 2731; and Respondent
17	ANTONIA HENRIETTA PAPADATOS violated Code section 10159.5 and Regulations
18	section 2725. Alwayzz Inc's and Respondent ANTONIA HENRIETTA PAPADATOS'S real
19	estate licenses were suspended for 90 days, stayed upon certain terms and conditions.
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1	FIRST CAUSE OF ACTION
2	(CRIMINAL CONVICTION)
3	5.
4	On or about July 28, 2014, a felony complaint was issued against Respondent in
5	the Superior Court of California, County of San Bernardino, Case No. FVI1402819. On or
6	about July 30, 2014, the Court ordered Warrant of Arrest issued for Respondent. On or about
7	January 31, 2018, Respondent pled guilty and was convicted for violation of California Penal
8	Code section 459 (Burglary Second Degree), a misdemeanor. Respondent was placed on
9	36 months of probation, and ordered to serve 180 days in jail and pay restitution, fines and fees.
10	6.
11	The conviction described in Paragraph 5 bears a substantial relationship under
12	Regulations section 2910 to the qualifications, functions or duties of a real estate licensee.
13	7.
14	The crime of which Respondent was convicted, as described in Paragraph 5
15	above, constitutes cause under Code sections 490 and 10177(b)(1) for the suspension or
16	revocation of all the licenses, license rights, and license endorsements of Respondent under the
17	Real Estate Law.
18	SECOND CAUSE OF ACTION
19	(FAILURE TO REVEAL PENDING CHARGES ON LICENSE RENEWAL APPLICATION)
20	8.
21	On or about February 1, 2017, Respondent certified and submitted her Broker
22	Renewal Application. In response to Question 17, to wit, "ARE THERE CRIMINAL
23	CHARGES PENDING AGAINST YOU AT THIS TIME, OR ARE YOU CURRENTLY
24	AWAITING JUDGMENT AND SENTENCING FOLLOWING ENTRY OF A PLEA OR
25	JURY VERDICT? IF YES, COMPLETE ITEM 22", Respondent answered "NO," and failed
26	to disclose the pending charges described in Paragraph 5 above.
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Respondent's failure to reveal the pending charges, as set forth in Paragraph 5
 above, in her license renewal application constitutes procurement of a real estate license
 renewal by fraud, misrepresentation, or deceit, or by making a false statement of material fact
 required to be revealed in said application, and constitutes cause under section 10177(a) of the
 Code for the suspension or revocation of all the licenses, license rights, and license
 endorsements of Respondent under the Real Estate Law.

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⁹ Code section 10106 provides, in pertinent part, that in any order issued in
 ¹⁰ resolution of a disciplinary proceeding before the Department of Real Estate, the Commissioner
 ¹¹ may request the administrative law judge to direct a licensee found to have committed a
 ¹² violation of this part to pay a sum not to exceed the reasonable costs of the investigation and
 ¹³ enforcement of the case.

WHEREFORE, Complainant prays that a hearing be conducted on the
allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
disciplinary action against all the licenses, license rights, and license endorsements of
Respondent ANTONIA HENRIETTA PAPADATOS under the Real Estate Law, for the cost of
investigation and enforcement as permitted by law, and for such other and further relief as may
be proper under other applicable provisions of law.

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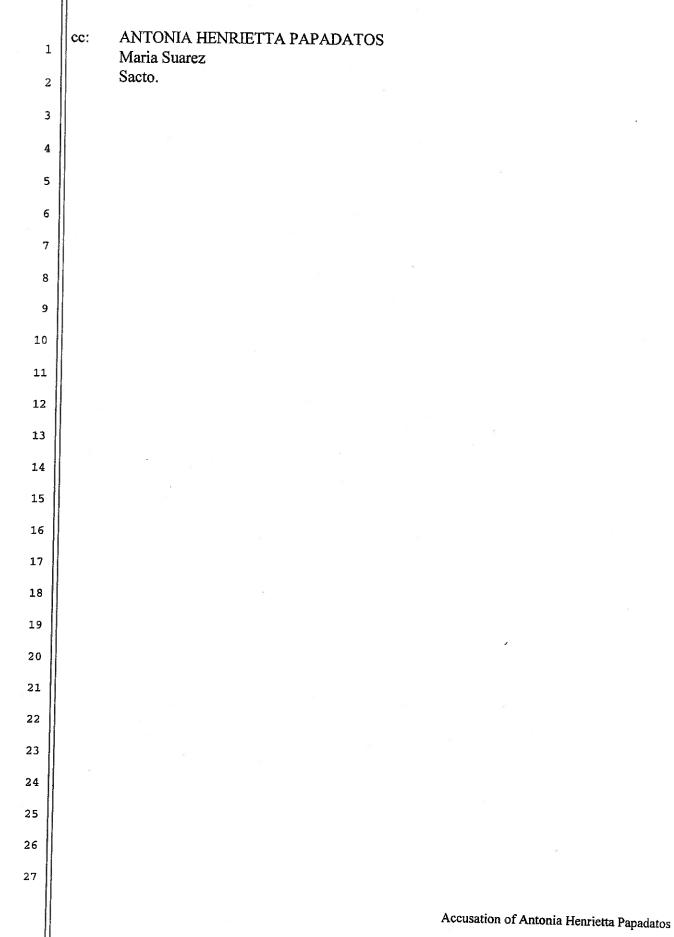
Dated at Los Angeles, California 21

this 26 day of September, 20 18.

Maria Suarez

Supervising Special Investigator

Accusation of Antonia Henrietta Papadatos



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