

BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

**FILED**

MAY 15 2019

DEPT. OF REAL ESTATE

By 

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In the Matter of the Accusation of: )  
ANTONIA HENRIETTA PAPADATOS )  
Respondent. )  
DRE No. H-41020 LA  
OAH No. 2018100774

DECISION

The Proposed Decision dated April 5, 2019, of the Administrative Law Judge of the Office of Administrative Hearings, is hereby adopted as the Decision of the Real Estate Commissioner in the above-entitled matter.

The Decision suspends or revokes one or more real estate licenses.

Pursuant to Government Code Section 11521, the Department of Real Estate may order reconsideration of this Decision on petition of any party. The party seeking reconsideration shall set forth new facts, circumstances, and evidence, or errors in law or analysis, that show(s) grounds and good cause for the Commissioner to reconsider the Decision. If new evidence is presented, the party shall specifically identify the new evidence and explain why it was not previously presented. The Department's power to order reconsideration of this Decision shall expire 30 days after mailing of this Decision, or on the effective date of this Decision, whichever occurs first.

The right to reinstatement of a revoked real estate license or to the reduction of a penalty is controlled by Section 11522 of the Government Code. A copy of Sections 11521 and 11522 and a copy of the Commissioner's Criteria of Rehabilitation are attached hereto for the information of respondent.

This Decision shall become effective at 12 o'clock noon on JUN 04 2019.

IT IS SO ORDERED May 6, 2019

DANIEL SANDRI  
ACTING REAL ESTATE COMMISSIONER

*Daniel J. Sandri*

BEFORE THE  
DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

In the Matter of the First Amended  
Accusation Against:

ANTONIA HENRIETTA PAPADATOS,

Respondent.

Case No. H-41020 LA

OAH No. 2018100774

**PROPOSED DECISION**

Carmen D. Snuggs, Administrative Law Judge (ALJ), Office of Administrative Hearings (OAH), State of California, heard this matter on March 7, 2019, in Los Angeles.

Steve Chu, Counsel for the Department of Real Estate (Department), appeared on behalf of complainant Maria Suarez, Supervising Special Investigator for the Department. John D. Bishop, Ray & Bishop, PLC, appeared on behalf of respondent Antonia Henrietta Papadatos, also known as Antonia Henrieta Papadatos, who was present.

Oral and documentary evidence was received. The record was closed and the matter submitted for decision on March 7, 2019.

Following submission of the matter and upon review of complainant's Exhibit 3, the ALJ noted the document contained respondent's date of birth. In order to protect respondent's privacy and confidentiality, the ALJ redacted this information from the exhibit.

**SUMMARY**

Complainant brings the First Amended Accusation<sup>1</sup> to impose disciplinary action on respondent's licenses, license rights, and license endorsement based on respondent's

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<sup>1</sup> The ALJ granted complainant's unopposed motion to amend the First Amended Accusation as follows:

(1) the phrase "and the underlying conduct" is added to paragraph 6 at page three, line 11, so that paragraph 6 states, "The conviction described in Paragraph 5 and the underlying conduct bear a substantial relationship under Regulations section 2910 to the qualifications, functions, or duties of a real estate licensee."; and (2) the phrases "and the underlying

conviction for violating Penal Code section 459 (burglary), her conduct underlying the conviction, and her failure to disclose pending criminal charges on her broker's license renewal application. Respondent maintains she has demonstrated sufficient mitigation and rehabilitation to be granted a restricted salesperson license. Complainant established, by clear and convincing evidence, that revocation of respondent's real estate licenses, license rights, and license endorsement is warranted.

## FACTUAL FINDINGS

### *Parties and Jurisdiction*

1. On September 26, 2018, complainant filed the First Amended Accusation while acting in her official capacity as a Supervising Special Investigator of the Department. Respondent timely submitted a Notice of Defense, which contained a request for a hearing to contest the First Amended Accusation.

2. Respondent was originally licensed as a real estate broker on April 28, 2005. Her broker license will expire on April 27, 2021, unless renewed. In addition, since October 26, 2005, respondent has been licensed as an Officer of Alwayzz Inc. (Alwayzz), which has license rights as a real estate corporation acting by and through respondent as its designated broker-officer. Her officer's license will expire on October 25, 2021, unless renewed. Since December 2, 2010, respondent has held a mortgage loan originator license endorsement.

### *Prior Discipline History*

3. A. On May 22, 2013, in Department case number H-38887 LA, complainant signed an Accusation alleging that: 1) In October 2010, Alwayzz and respondent failed and refused to pay \$22,215.06 in net sales proceeds due to a seller/executor; 2) between January 1, 2010 and March 31, 2012, Alwayzz committed the following acts in violation of the Business and Professions Code: it permitted and/or allowed an employee to withdraw or disburse trust funds from an escrow account without the prior written consent of the owners of said funds as required by statute, such that the trust account had a shortage of at least \$35,075; permitted an unlicensed and unbonded person as a signatory on the trust account; failed to notify the Department of its mortgage loan activity; engaged in mortgage loan originator (MLO) business activities without first obtaining an endorsement to its license; in two instances, failed to maintain Mortgage Loan Disclosure Statements (MLDS) signed by

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conduct" and "and 10177(j)" were added to paragraph 7 at page three, line 15, and the word "constitutes" was changed to "constitute" so that paragraph 7 states, "The crime of which Respondent was convicted, as described in Paragraph 5 above, and the underlying conduct constitute cause under Code sections 490, 10177(b)(1), and 10177(j) for the suspension or revocation of all the licenses, license rights, and license endorsements of Respondent under the Real Estate Law." The ALJ made these amendments to the First Amended Accusation by interlineation. (Ex. 1.)

borrowers and the loan agent; failed to disclose its real estate broker license number on the MLDS in at least one instance, and did not disclose its MLO license endorsement number in two instances; and failed to comply with a subpoena duces tecum for the audit examination or to provide the auditor with records of its activities requiring a real estate broker license during the previous three years; and 3) between January 1, 2010 and March 31, 2012, respondent failed to disclose her broker license number and MLO license endorsement number on her business card at the first point of contact with the customer; and respondent used the fictitious name "Always Care Funding & Realty" on her business card.

B. On June 16, 2014, respondent on her own behalf and on behalf of Alwayszz, signed a Stipulation and Agreement agreeing that the conduct, acts, or omissions set forth in the Accusation constituted cause to suspend Alwayszz's and respondent's license and license rights. By way of the Stipulation and Agreement, the Department issued an Order suspending Alwayszz's and respondent's licensing rights for 90 days. The initial 30 days of the suspension was stayed for two years on condition that Alwayszz and respondent paid monetary penalties of \$3,000 each and no further cause for discipline occurred within two years of the effective date of Department's Decision based upon the Stipulation and Agreement. The Order also stayed the remaining 60 days of suspension for two years if Alwayszz and respondent obeyed all licensing laws, and no cause for disciplinary action occurred within two years from the effective date of the Decision. Alwayszz and respondent agreed to joint and several liability for the cost of the audit in the amount of \$7,068.00, and respondent agreed to pay the Real Estate Commissioner's investigation and enforcement costs of \$3,212. In addition, respondent was ordered to take and pass the Professional Responsibility Examination and her licenses and licensing rights were suspended indefinitely until she provided proof of successful completion of a continuing education course on trust fund accounting and handling. On August 26, 2014, the Commissioner adopted the Stipulation and Agreement and Order. The Decision became effective on August 26, 2014.

4. Respondent complied with the Department's Order.

#### *Respondent's Conviction*

5. On January 31, 2018, in the Superior Court of California, County of San Bernardino, Case No. FVI1402819, respondent was convicted on her guilty plea of violating Penal Code section 459 (burglary), a misdemeanor. The court found that there was a factual basis for the plea, withheld judgment, and placed respondent on probation for three years on condition that she serve 180 days in the San Bernardino County Jail and pay fines and fees. Respondent received two days' credit towards her 180-day jail term, and she was ordered to serve the balance in a work-release program at Glen Helen Rehabilitation Center beginning March 2, 2018, and complete the program by April 2, 2019. The court indicated that it would determine victim restitution at a future date.

6. A. The facts and circumstances underlying respondent's conviction are that respondent presented herself as a real estate agent using the assumed name Rebecca Stein and claimed that she was employed by Inland Pacific Management (Inland Pacific). She

attempted to rent a vacant house in Apple Valley, California to an individual who became aware of the property through a Craig's List advertisement. Respondent arranged to meet the potential renter's representative at the property on April 4, 2014, for a walk-through. She directed the representative to bring a cashier's check in the amount of \$3,890 payable to T.B., an individual whom respondent represented was the owner of the property. The representative became suspicious of respondent and of the transaction and contacted the San Bernardino County Sheriff's Department.

B. Officer Gary McWilliams of the San Bernardino County Sheriff's Department conducted an investigation. He determined that Inland Pacific did in fact exist and, after speaking with an Inland Pacific employee, but that Rebecca Stein did not work for the company. On April 4, 2014, Officer McWilliams arrived at the Apple Valley property shortly after the meeting time arranged by respondent and the representative. Upon questioning by Officer McWilliams, respondent provided her identification, which revealed her true identity. She told Officer McWilliams that she worked for a property management company, but would not provide any further information after Officer McWilliams challenged her assertion regarding her employment with Inland Pacific. Officer McWilliams arrested respondent at the property and recovered two cellular phones from her, one of which contained two e-mail addresses that appeared connected to Inland Pacific. He also recovered a notebook from respondent's car containing names, addresses, and dates of birth. Officer McWilliams' further investigation revealed that respondent was not an Inland Pacific employee, the two email addresses were not legitimate Inland Pacific email accounts, and T.B. did not own the Apple Valley property.

C. On July 28, 2014, a felony complaint was filed against respondent and on July 30, 2014, the court ordered the issuance of an arrest warrant for respondent's arrest on an ex parte basis pursuant to Penal Code section 813, subdivision (a), and *People v. Session* (1968) 68 Cal.2d 418.<sup>2</sup> The Minute Order from the July 30, 2014 hearing listed respondent's custody status as "fugitive," suggesting that respondent failed to appear for a prior court proceeding. Respondent was arrested in July of 2017.

7. Respondent contended that she completed the work release program in 89 or 90 days because she was given double credit for her time in the program. She stated that the court did not order her to pay restitution and that she paid the court-ordered fines and fees. One week prior to this hearing in this administrative matter, the criminal court denied respondent's motion to terminate her probation early. Accordingly, respondent remains on probation until January 2021. Respondent's conviction has not been expunged.

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<sup>2</sup> The statute and the holding in the case provide that where a complaint is filed that alleges a felony offense, an arrest warrant may be issued if, and only if, the magistrate is satisfied that the offense has been committed and there is a reasonable basis to believe the defendant committed the offense.

*License Renewal Application*

8. On January 30, 2017, respondent filed a Broker Renewal Application with the Department. This application resulted in the renewal of the broker license referenced in Factual Finding 2. The application required respondent to answer a question asking whether there were criminal charges pending against her at that time. Under penalty of perjury, respondent answered "No" to that question.

*Respondent's Evidence*

9. Respondent has operated Alwayzz since 2005. She obtained a Bachelor of Arts degree in business administration and a Bachelor of Science degree in political science from the University of Southern California in 2003. Respondent also attended Whittier Law School for one year.

10. With respect to the Department's prior discipline against respondent's licensing rights, respondent asserted that a former Alwayzz employee took funds from the escrow account and she rectified the situation. At that time, she employed 20 individuals who worked in the capacity of salespersons and loan mortgagers. Respondent indicated that she took full responsibility for the incidents described in the previous Accusation and voluntarily entered into the Stipulation and Agreement.

11. A. Respondent contended that she did not attempt to conceal the criminal charges pending against her when she completed her renewal application on January 30, 2017. She explained that following her arrest in April 4, 2014, she appeared in court in May 2014 and was told that no charges had been filed by the prosecutor at that time. She stated that she received no notice of the charges filed in July 2014 although she has lived at the same address since 2006. Respondent did not make any effort to determine if charges had been filed, and she contended that she did not become aware of the criminal charges until she was arrested in July 2017, six months after she submitted her Broker Renewal Application to the Department.

B. Respondent's testimony was not persuasive. Even if she had been informed at her initial court appearance that the prosecutor had not filed charges, respondent was aware when she completed her renewal application that she had been arrested and the matter had not been resolved. The criminal case documents suggest that respondent failed to appear for a hearing, and she made no effort to determine the status of the criminal matter. At the very least, respondent was likely aware when she appeared in criminal court that criminal charges were about to be filed against her. Respondent failed to disclose the pending criminal charges when she submitted her Broker Renewal Application in January 2017.

12. A. At hearing, respondent asserted that she answered an advertisement on Craig's List for an assistant property manager position at Inland Pacific. She explained that she sought employment at that time to supplement her income because her business had

slowed. Respondent claimed she applied for the position by telephone, she was hired for the position on February 14, 2014, and that she was informed the position was commission-based. She stated that she was instructed to download an application to her cellular telephone so that potential renters could contact her, and that she was to identify herself as Rebecca Stein. Respondent asserted that when she asked why she was asked to identify herself in that manner, she was informed that Rebecca Stein had recently separated from Inland Pacific and was already known to the customers. Respondent further stated that she did not ask any further questions nor did she conduct any research on Inland Pacific. She indicated that in hindsight, the situation was suspicious, that she should have performed research on Inland Pacific, and that she "looked the other way" because she was experiencing financial stress. Respondent identified herself as Rebecca Stein when she answered the telephone, in e-mail and text messages, and when she showed properties to customers. Respondent indicated that the individuals who offered her the position created the two e-mail addresses that she utilized, which appeared connected to Inland Pacific. She stated she was never paid nor did she receive a commission because she did not rent any properties, accept any funds, or execute any leases in connection with Inland Pacific.

B. Respondent contended that she was informed by the individuals who offered her the position, whom she believed represented Inland Pacific, that she was authorized to rent the properties and access the lock-box on the properties if a potential renter was approved. As to the property in Apple Valley, respondent stated that she was instructed to ask the potential renter to make the cashier's check payable to T.B. She met the potential renter at the property, opened the lock-box, allowed the potential renter's representative to inspect the property, and was waiting in the kitchen when Officer McWilliams arrived. Had she received the cashier's check, her next step was to meet with, and turn the cashier's check over to, the individuals she thought were connected to Inland Pacific.

C. Respondent denied knowing that she was involved in a scam, and contended that although she knew she engaged in wrongdoing by representing herself as Rebecca Stein, she did not know that she was not working for Inland Pacific until 2017 when she was so informed by her criminal attorney. At the hearing she claimed that she did not recall the names of the two or three individuals with whom she interacted and whom she believed to represent Inland Pacific. Respondent expressed embarrassment for her role in the scam, she stated she felt "horrible" about her actions, took full responsibility for her actions, and appeared genuinely concerned that her actions could have resulted in defrauding members of the public had the transaction in Apple Valley or a transaction in connection with any other property been completed. According to respondent, her financial circumstances have now improved, and if she suffers financial difficulty in the future, she will not engage in the conduct that led to her conviction, but instead will seek and ensure legitimate employment.

13. Respondent's account regarding how she came to represent herself as Rebecca Stein and believe that she was employed at Inland Pacific does not ring true. For example, her contention that she does not recall the names of the two or three individuals that she claimed to have corresponded with and whom she believed represented Inland Pacific, is



implausible. The fact remains that she was complicit in fraudulently representing that she was someone else, and she was convicted of burglary pursuant to her guilty plea, which is a crime that is substantially related to the qualifications, duties, and functions of a Department licensee as set forth in Legal Conclusion 4.

14. A. Respondent offered seven letters written by individuals who have known respondent in a personal and/or professional capacity. Five of the individuals expressed knowledge that respondent had suffered a conviction, although they did not reference the nature of respondent's conviction. They describe respondent as caring, selfless, passionate and knowledgeable about real estate, as well as having expressed genuine remorse for her conduct leading to her conviction. Two of the individuals indicated that respondent assisted them with home purchases and that respondent was very professional and skilled throughout that process. All of the individuals were supportive of respondent maintaining her licenses and licensing rights.

B. One of the letter writers, Jay Peterson, testified at the hearing. He has known respondent for 13 years and she has mentored him in the real estate industry. They also volunteer with the same organization that feeds the homeless. Mr. Peterson recalled that respondent told him that she obtained a position with Inland Pacific and that she would be taking over accounts for someone who had been fired. Mr. Peterson asserted that he was aware of respondent's prior discipline and conviction and her failure to disclose the pending criminal charges on her Broker Renewal Application. He indicated that respondent has expressed genuine remorse for her conduct. He considers respondent to be an honest person and supports her desire to maintain her licenses and licensing rights.

15. Respondent performs volunteer work at the Animal Friends of the Valley, assists with feeding the homeless on the Thanksgiving holiday in downtown Los Angeles, California, and she helps collect clothes and food for veterans at Operation Care. She volunteers with West End Real Estate Professionals every three to four months, where she informs other real estate professionals of recent developments in the industry, and she served as President of the Women's Council of Realtors. Respondent received a Certificate of Appreciation from the West End Real Estate Professionals in 2018 for serving on the Events Committee, and on December 8, 2018, she successfully completed an online Realtor's Code of Ethics course.

16. Respondent stated that she understands the Department's concern regarding her previous dishonest acts. She expressed a desire for the Department to grant her a restricted salesperson license and stated that she would abide by any accompanying limitations and conditions. Respondent further stated that she is aware of qualified brokers who know of her conviction and would supervise her if she were to be granted a restricted salesperson license, but failed to support her assertion with testimony, letters, or declarations of a qualified broker.

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## Costs

17. Complainant submitted documentation showing that the Department has incurred \$1,787.25 in investigative costs for 29 and one-half hours of Department employees' time at varying hourly rates. In addition, counsel for the Department has billed the Department \$890 in enforcement costs, consisting of 10 hours of attorney time at \$89 per hour. The Department's total investigation and enforcement costs are \$2,677.35. This amount is reasonable. Respondent did not dispute the amount of costs requested by the Department nor did she submit any evidence demonstrating that she was unable to pay the costs.

## LEGAL CONCLUSIONS

### *Disciplinary Authority*

1. The Department is the state agency responsible for licensing and regulating real estate brokers. (Bus. & Prof. Code, §10050, subd. (a)(2).)<sup>3</sup> The Department's highest priority in exercising its licensing and disciplinary functions is public protection. (§ 10050.1.)

2. The burden of proof is on the Department to establish cause for discipline against respondent's licenses, licensing rights, and license endorsement by clear and convincing evidence to a reasonable certainty. (*Realty Projects Inc. v. Smith* (1973) 32 Cal.App.3d 204, 212.) Clear and convincing evidence requires proof that is so clear as to leave no substantial doubt and that is sufficiently strong to command the unhesitating assent of every reasonable mind. (*In re Marriage of Weaver* (1990) 224 Cal.App.3d 478, 487.)

3. Procuring or attempting to procure a license renewal by making a material misstatement of fact in an application for license renewal is grounds for revocation or suspension. (§ 10177, subd. (a).)

4. The Department may revoke or suspend the license of a real estate licensee if the licensee has been convicted of a crime that is substantially related to the qualifications, functions, or duties of a real estate licensee. (§§ 490, subd. (a), 10177, subd. (b).) A crime is substantially related to the qualifications, functions, and duties of a licensee within the meaning of section 490 if it involves the employment of bribery, fraud, deceit, falsehood or misrepresentation to achieve an end. (Cal. Code Regs. (CCR), tit. 10, § 2910, subd. (a), criterion (4).) Respondent's misdemeanor conviction for burglary as set forth in Factual Findings 5 through 7, and her conduct underlying the conviction as set forth in Factual Findings 6 and 12, are substantially related to the qualifications, functions and duties of a real estate licensee pursuant to CCR section 2910, subdivision (a), criterion 4. Respondent's

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<sup>3</sup> Further references to statute are to the Business and Professions Code.

crime and her underlying conduct involved the employment of fraud, deceit, falsehood and misrepresentation to achieve an end. (Factual Findings 5 through 7, 12.)

5. Under Business and Professions Code section 10177, subdivision (j), the Department may revoke or discipline a real estate salesperson's license if the licensee has engaged in any conduct that constitutes fraud or dishonest dealing.

6. Cause exists to suspend or revoke respondent's licenses, license rights, and license endorsements pursuant to Business and Professions Code sections 490, subdivision (a), and 10177, subdivision (b), for conviction of a crime substantially related to the qualifications, functions, and duties of the licensee, as set forth in Factual Findings 5 through 7, and 12.

7. Cause exists to suspend or revoke respondent's licenses, license rights, and license endorsements pursuant to Business and Professions Code section 10177, subdivision (j), for engaging in conduct that constitutes fraud or dishonest dealing, as set forth in Factual Findings 6 and 12.

8. Cause exists to suspend or revoke respondent's licenses, license rights, and license endorsements pursuant to Business and Professions Code section 10177, subdivision a), for 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 a renewal application, as set forth in Factual Findings 8 and 11.

#### *Rehabilitation*

9. The rehabilitation criteria the Department must consider when determining license discipline are set forth at CCR section 2912. Respondent meets the following applicable criteria: Five years have elapsed since respondent engaged in the conduct underlying her conviction; (CCR, §2912, subd. (a)(1); Factual Findings 6 and 12); respondent has paid all fines and fees ordered by the court; (CCR, §2912, subd. (g); Factual Finding 7); she completed a vocational training course related to her misconduct and is active in real estate industry organizations; (CCR, §2912, subd. (k); Factual Finding 15); respondent participates in significant and conscientious community service projects that are designed to provide social benefits or to ameliorate social problems. (CCR, §2912, subd. (l); Factual Findings 14B and 15); and she professed a change in attitude from that which existed at the time she committed her offense in 2014, which was supported by references who attested to her demonstration of sincere remorse, and she has not engaged in conduct since that time that would provide grounds for disciplining a licensee (CCR, §2912, subd. (m); Factual Findings 12A, 12C, and 14.) However, because she remains on probation until January 2021, respondent's good behavior since her conviction is accorded little weight because persons under supervision of correctional authorities are required to behave in exemplary fashion. (*In re Gossage* (2000) 23 Cal.4th 1080, 1099.)

10. Respondent does not meet the following rehabilitation criteria: Less than two years have passed since respondent's substantially related conviction. (CCR, § 2912, subd. (a); Factual Finding 5.) Respondent's conviction has not been expunged, and she is scheduled to remain on probation until January 2021. (CCR, § 2912, subds. (c) & (e); Factual Finding 7.)

11. Respondent expressed remorse and acceptance of responsibility for her conduct. (Factual Findings 12A and 12C.) These are the cornerstones of rehabilitation, which is a "state of mind" reflecting "reformation and regeneration." (*Pacheco v. State Bar* (1987) 43 Cal.3d 1041, 1058.) She appreciated the seriousness of her criminal behavior. (Factual Findings 12A and 12C.) However, while remorse and acceptance of responsibility are necessary to show rehabilitation, a truer indication of rehabilitation is sustained conduct for an extended period of time. (*In Re Menna* (1995) 11 Cal.4th 975, 971). Here, while respondent currently appears to be on the right path, at a minimum she exercised poor judgment and engaged in conduct and committed a crime that involved fraud, dishonesty, and misrepresentation that could have resulted in defrauding the public and rightful homeowners, and her probation is not scheduled to terminate until 2021. In addition, respondent has demonstrated a pattern of willful ignorance by failing to be proactive in protecting her own brokerage, by failing to make inquiries or conduct research regarding her role as a "property management" agent, and by not ascertaining whether charges had been filed subsequent to her arrest (and appearing in court) before submitting her renewal application, even though she clearly had notice that there was the potential of the filing of criminal charges. Given this pattern, not enough time has passed for respondent to demonstrate the integrity and high professional standards required of a real estate broker and the real industry in general. Respondent failed to disclose her pending criminal charges which demonstrated further lack of integrity. Moreover, respondent engaged in the conduct underlying her conviction while the Department's discipline in the prior administrative matter was in process. Further, the Department's prior discipline against respondent was based on respondent's misconduct that was directly related to her duties as a real estate professional. Accordingly, the public protection requires the revocation of respondent's broker license, license as an officer of Alwayzz, and her mortgage license endorsement.

#### *Cost Recovery*

12. The Department may recover from respondent the reasonable costs of investigation and enforcement under Business and Professions Code section 10106.

13. Under *Zuckerman v. State Board of Chiropractic Examiners* (2002) 29 Cal. App. 4th 32, 45, the Department must exercise its discretion to reduce or eliminate cost awards so as to prevent cost award statutes from deterring licensees with potentially meritorious claims or defenses from exercising their right to a hearing. The Department must also consider the licensee's ability to make payment.

14. The reasonable costs of investigation and enforcement in this matter are \$2,677.35, as set forth in Factual Finding 17. Respondent proffered no evidence suggesting

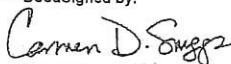
she would not be able to pay the Board's costs. Accordingly, respondent shall be ordered to pay the Board's costs in the total amount of \$2,677.35.

ORDER

1. All licenses and licensing rights of respondent Antonia Henrietta Papadatos under the Real Estate Law are revoked.

2. Respondent shall pay costs of \$2,677.35 to the Real Estate Commissioner in the form of a cashier's check or certified check within 30 days of the effective date of this Decision, or on a payment plan by agreement with the Commissioner.

DATED: April 5, 2019

DocuSigned by:  
  
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CARMEN D. SNUGGS  
Administrative Law Judge  
Office of Administrative Hearings