

FILED

BEFORE THE BUREAU OF REAL ESTATE

MAR 26 2018

STATE OF CALIFORNIA

BUREAU OF REAL ESTATE

By B. Nicholas

* * *

In the Matter of the Accusation of	)	CalBRE No. H-6572 SAC
TERINA ROXSAND PIRHOFFER,	)	OAH No. 2017090388
Respondent.	)	

DECISION

The Proposed Decision dated February 22, 2018, 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, but the right to a restricted broker license is granted to Respondent.

Pursuant to Government Code Section 11521, the Bureau 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 Bureau'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 APR 16 2018.

IT IS SO ORDERED

March 23, 2018

WAYNE S. BELL
REAL ESTATE COMMISSIONER



By: DANIEL J. SANDRI
Chief Deputy Commissioner

BEFORE THE
BUREAU OF REAL ESTATE
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

TERINA ROXSAND PIRHOFFER,

Respondent.

Case No. H-6572 SAC

OAH No. 2017090388

PROPOSED DECISION

Administrative Law Judge Wilbert E. Bennett, State of California, Office of Administrative Hearings, heard this matter on January 23, 2018, in Sacramento, California.

Kyle Jones, Counsel, Bureau of Real Estate (Bureau), represented complainant Tricia D. Parkhurst, Supervising Special Investigator.

Respondent Terina Roxsands Pirhofer was present and was represented by Frank Buda, Attorney at Law.

Evidence was received, the record was closed, and the matter was submitted for decision on January 23, 2018.

At the commencement of the hearing, complainant amended the Accusation by interlineation to correct clerical errors, at paragraph 2, by deleting references to Vehicle Code sections 23152, subdivision (a), and 23578.

FACTUAL FINDINGS

Procedural Background

1. On August 7, 2017, complainant filed the Accusation in her official capacity. Complainant seeks to impose disciplinary action against respondent's real estate broker license based on convictions for drunk driving and for obscene, threatening, or annoying

telephone calls, and her failure to report either of those convictions to the Bureau within 30 days.

2. Respondent is presently licensed and/or has license rights under the real estate law as a real estate broker.

Criminal Convictions

3. On April 17, 2016, in the Sacramento County Superior Court, Case No. 16MI005265, respondent was convicted, by guilty plea, of violating Vehicle Code section 23152, subdivision (b) (driving while having .08 percent or more, by weight, of alcohol in blood), a misdemeanor. Pursuant to said conviction, respondent was placed on informal probation for a period of three years on certain terms and conditions, including service of 15 days in the county jail or in a work release program, completion of a six-month First Offender Program, a prohibition against driving with any measurable amount of alcohol in her system, and payment of applicable fines and fees.

4. The facts and circumstances underlying this conviction involved respondent's driving while under the influence of alcohol, on February 13, 2016, with a blood alcohol content of .16 percent. Respondent was arrested by law enforcement officials at her residence in Folsom after completing an approximate 28-mile round trip drive from Folsom to Roseville. Prior to driving to Roseville, respondent consumed sufficient alcohol to result in her measured blood alcohol content, which reflected twice the legal limit. While in Roseville, respondent had been involved in a verbal altercation, while intoxicated, which resulted in a request for police intervention. That request culminated in respondent's arrest upon her return to Folsom. Earlier in the day, respondent had made an annoying phone call to the person with whom she had the verbal altercation in Roseville.

5. On July 22, 2016, in the Placer County Superior Court, Case No. 62-144484, respondent was convicted, by guilty plea, of violating Penal Code section 653m, subdivision (a) (obscene, threatening, or annoying telephone calls), a misdemeanor. Pursuant to said conviction, respondent was placed on informal probation for a period of three years on certain terms and conditions, including service of 20 days in the county jail or in a work release program, a stay away order with respect to the identified victim, completion of a 40-hour anger management program, a six-month prohibition against alcohol consumption, submission to alcohol testing as directed by law enforcement, and payment of applicable fines and fees.

6. The facts and circumstances underlying the convictions set forth in Finding 3 and 5 above are factually related as hereafter set forth. The underlying criminal offenses relate to a continuous course of conduct engaged in by respondent on February 13, 2016. On that date, respondent made an annoying, threatening, and/or obscene telephone call in the morning, at her residence, prior to consuming alcohol, and then drove approximately 14 miles to confront the phone call recipient while in an inebriated condition. According to respondent, the content of her offensive telephone call was substantially as follows: "If you

come on my property to harm my family, I will kill you.” She did not recall using any obscene language. The recipient of the offensive telephone call, hereafter identified as the “victim,” reported to the police, in a 911 call, that respondent’s telephone call also included the following: “I don’t know where you live, but I’m going to find you, drag you outside and f---ing kill you.” The victim told police that earlier that day she had sent aggressive text messages to a close family member of respondent regarding an ongoing dispute between respondent’s family member and the victim’s daughter. By reason of a protective order filed in the instant case, the former person shall not be identified by true name, and any reference to that person shall identify her as “Ms. M.,” and her affiliation with respondent shall be described as a “close family member.” For reasons of confidentiality, the victim’s daughter shall be identified as “Jane Doe,” or “Jane D.”

Failure to Report Convictions Within 30 Days

7. Respondent failed to report either her drunk driving conviction or her obscene, threatening, or annoying telephone call conviction to the Bureau within 30 days, as required by Business and Professions Code section 10186.2, subdivisions (a)(1)(B) and (a)(2). At hearing, respondent testified that she erroneously believed that misdemeanor convictions are reportable to the Bureau only when filing a license renewal application. Respondent’s failure to report each of her misdemeanor convictions constitutes separate violations of the reporting obligations associated with licensure, and provides cause for discipline pursuant to Business and Professions Code section 10186.2, subdivision (b).

Factors in Aggravation, Mitigation, or Rehabilitation

8. Respondent is 45 years old, and described her marital status as “not currently married.” She has four children, ages 20 through 27. She has held a real estate broker license since 1995, and has no record of prior discipline. She is the designated broker/officer of Lexington Properties, Inc., which she incorporated in 2003. In that capacity, respondent currently has two full-time employees, comprised of a broker associate and licensed salesperson, and manages approximately 400 residential real property units. Respondent is a member of the National Association of Residential Property Managers. She has been involved in property management for virtually her entire career as a real estate licensee, which commenced when she was 21 years old upon obtaining a salesperson license in 1993.

9. The person identified in the evidentiary record as Ms. M., a close family member of respondent, testified on respondent’s behalf. (A protective order issued in the instant matter precludes any more specific identification of this witness.) Ms. M. also submitted a letter on respondent’s behalf, dated January 16, 2018, and testified that the matters therein set forth are true. She characterized that letter as a character reference letter, and as “an outline of the events” of February 13, 2016, which led to respondent’s criminal behavior on that date. Ms. M. stated that respondent’s criminal actions were motivated by “her fears for my safety and well-being,” and were out of character. She noted that respondent “has shown nothing but regret and remorse for the actions she took that day.” Ms. M.’s letter is hereafter set forth in pertinent part:

It is with regret that I admit to being involved and associated with individuals who partook in illegal activities and drug use. At the time of the incident stated above I was living in Los Angeles and reunited with a friend by the name of Jane Doe. We would visit with each other on a near daily basis. Both of us engaging in drug and alcohol use and at times escorting. There were instances when I would visit Jane D. at the home she occupied with her then husband. During my visits and interactions with Jane D. I was both a witness to and informed that her husband was in the drug distribution trade, that they used illegal drugs personally, and that Jane D. was at times paid for dating/escorting. I myself took drugs with Jane D. and her husband. In addition, Jane D. and I engaged in escorting together. There were several times during my visits that I witnessed violent outrages, both verbal and physical between Jane D. and her husband. I state this only to provide a background as to why I was growing deeply anxious and fearful of both parties.

A few days prior to February 13, 2016 when [respondent] was arrested, I informed Jane D. that I no longer wanted to be friends or associate with her. This infuriated her. She indicated that "I knew too much," and that was not going to happen. On the day [respondent] was arrested Jane D. started texting threats to my phone stating she was going to "destroy me" and "get me." She said that she had taken photos of me in compromising positions with [a] client that we both interacted with and she would be posting these all over the internet. The threats also included "getting me" because she believed I could or would tell her husband information about a pregnancy she was fabricating. One of Jane D.'s last texts after stating she was going to get me, was that she knew where I lived and listed my home address[in Folsom]. I was frightened and began forwarding all texts to [respondent]. There was a point during this text exchange where Jane D.'s mother began texting me as well. I told [respondent] everything that had been going on between Jane D. and I which caused her to be upset, despondent, fearful; and angry. I asked for her help. I deeply regret at this time getting [her] involved but it was my usual course of action during this time of my life. She has always done her best to protect me. I only learned of [her] arrest later that day, when Jane D. texted again, stating "your [close family member] has been arrested" with laughing emoticons and verbiage that they were going to "destroy her too."

10. Respondent testified regarding the events of February 13, 2016, which led to her arrest and convictions. She stated that when her close family member forwarded the threatening text messages and requested her assistance, she became alarmed and upset for two reasons: it was respondent's first notice that Ms. M. had engaged in a lifestyle and "escort" activities which placed her at risk of harm; and the threatening nature of the text messages themselves presented an imminent risk of harm. After receiving the threatening text messages forwarded by Ms. M., respondent requested Ms. M. to provide her with the phone number of [Jane D.'s] mother so that respondent "could get the threats stopped." At the time that she placed the offensive telephone call, respondent believed that the content of the text messages reflected a credible threat of violence and/or invasion of privacy directed against a close family member. At hearing, respondent admitted that her telephone statements to Jane D.'s mother were substantially as follows: "If you come on my property to harm my family, I will kill you." Thereafter, respondent obtained the address of Jane D.'s mother in Roseville (from Ms. M.) because she wished a personal interaction. Respondent testified that, in driving to Roseville, she did not intend to harm Jane D.'s mother, but "believed that things could be resolved in person." Up to this point, respondent had not consumed alcohol but then consumed a bottle of wine prior to driving to Roseville where she arrived at the residence of Jane D.'s mother in an extremely inebriated condition. Immediately after respondent's arrival, Jane D.'s mother called 911 because of the earlier offensive telephone call. Respondent left the premises, without threats or physical altercation, after attempting to engage Jane D.'s mother regarding the threatening text messages and telling her to stop threatening respondent's close family member.

11. At the hearing, respondent admitted that she reacted inappropriately, in relating to Jane D.'s mother, out of a protective family instinct. She recognized that what she did "was wrong" and that her conduct was not excused because of what she perceived to be threatened harm to a family member. She expressed extreme regret for her criminal conduct, which she "would never do again under any circumstance." Respondent has not consumed alcohol since the date of her criminal conduct. She acknowledged that a more prudent course of action would have been to alert law enforcement authorities regarding what she interpreted as threats of physical harm and/or posting of compromising photographs directed against a close family member.

12. Respondent submitted five supporting character reference letters, which included letters from her adult son, a lifelong friend, and three professional colleagues. A common theme in the letters is that respondent's criminal conduct on the date in question was extremely aberrant. Joseph S. Pirhofer, respondent's adult son, stated that he was "simply bewildered" when apprised of his mother's reported out-of-character behaviors. He further stated that subsequently respondent "expressed only regret and remorse in regard of all of this."

Morgana Walden, who has known respondent for 38 years, stated that she has always found respondent "to be honest, trustworthy, and ethical," and has never seen her verbally aggressive towards anyone. Ms. Walden further stated: "In our personal conversations, she has repeatedly expressed remorse over the situation in which she now finds herself

(concerning her convictions and failure to self-report to the BRE), and I believe her to be truly sorry.” Mishele Minor is a broker associate employed by respondent. Ms. Minor stated: “I have never seen [respondent] come to work under the influence of alcohol or act aggressively in a working situation. Property management can be very stressful dealing in certain situations and [respondent] has always acted professional [sic] in every business situation.” Ms. Minor further noted that respondent “has shown remorse and regret for what she has done.”

Holly Hoekstra is a property investor, and a professional client of respondent’s property management company (since August 2015). Ms. Hoekstra recommended respondent as “an honest, trustworthy property manager.”

Thomas M. Hogan is an attorney in the Sacramento area who has specialized in real estate and property management matters for over 25 years. He has known respondent for approximately 20 years, as a client and friend. Mr. Hogan rated respondent highly in the areas of professional presentation, degree of preparedness, and professional knowledge. Mr. Hogan further stated: “I have been with Ms. Pirhofer in many stressful situations in courts of law, and Ms. Pirhofer remained cool and professional through a number of very stressful episodes.”

13. In evaluating respondent’s rehabilitation from her criminal behavior, which is of recent vintage, it is significant that she has taken an essential step towards rehabilitation: full acknowledgment of wrongdoing. (See, *Seide v. Committee of Bar Examiners of the State Bar of California* (1989) 49 Cal.3d 933, 940 [“Fully acknowledging the wrongfulness of his actions is an essential step towards rehabilitation”].) Respondent expressed remorse and acknowledged that engaging in unlawful conduct under the circumstances presented was unacceptable and indefensible.

14. In assessing respondent’s rehabilitation and current fitness for licensure in light of the Bureau’s public protection mandate, the nature of respondent’s convictions must be considered. Respondent’s drunk driving conviction involved driving with a blood alcohol level of .08 percent or more, under circumstances where her blood alcohol level was measured at .16 percent, which is twice the legal limit. With regard to respondent’s annoying or threatening phone call offense, Penal Code section 653m, subdivision (a), by its terms, states: “Every person who, with intent to annoy, telephones . . . another and addresses to . . . the other person any obscene language or addresses to the other person any threat to inflict injury to the person or property of the person addressed or any member of his or her family, is guilty of a misdemeanor.” Thus, respondent’s guilty plea to that offense necessarily means that her criminal annoying phone call involved obscene language and/or a threat to injure the recipient of the call, or a family member or the property of the recipient. A guilty plea is an admission of every element of the charged offense. (*Arenstein v. State Bd. of Pharmacy* (1968) 265 Cal.App.2d 179, 190.) The seriousness of respondent’s criminal conduct cannot be overemphasized. One of her criminal offenses created a risk of death or serious injury to herself or others, while her other criminal offense involved obscene

language and/or a threat to inflict injury to another person and/or a family member of that person.

15. The Bureau has adopted criteria for evaluating whether a licensee has been rehabilitated since he or she committed the act, misconduct, or omission that constitutes grounds for license discipline. (Cal. Code Regs., tit. 10, § 2912.) The criteria relevant here are: (1) the passage of at least two years since the licensee's most recent conviction; (2) successful completion or early discharge from probation or parole; (3) abstinence from the use of alcohol for not less than two years if the criminal conviction was attributable in part to the use of alcohol; (4) payment of any fine imposed in connection with the conviction; (5) change in attitude from that which existed at the time of the commission of the acts in question. (Cal. Code Regs., tit. 10, § 2912, subds. (a), (e), (f), (g), & (m).)

16. The application of these criteria indicates that respondent is on the road to rehabilitation, but is not fully rehabilitated. As noted above, in acknowledging her wrongful conduct, respondent has demonstrated the "change in attitude" required for a showing of rehabilitation. However, a showing of rehabilitation also requires sustained exemplary conduct over an extended period of time. (See, *In re Menna* (1995) 11 Cal.4th 975, 991.) An insufficient amount of time has passed for respondent to demonstrate full rehabilitation, in light of the seriousness and recency of her convictions and her continued status on criminal probation until July 2019. Only 22 months have elapsed since her drunk driving conviction, and only 17 months have elapsed since her annoying phone call conviction. Respondent is in compliance with her criminal probation requirements, but such compliance is discounted because of the expectation of good behavior associated with probation. (See, *In re Gossage* (2000) 23 Cal.4th 1080, 1099 [little weight is given to person's good behavior while on probation because such conduct is expected].) Respondent's abstinence from alcohol, by her testimony, is of approximately two years' duration, corresponding to the February 13, 2016 date of her drunk driving and annoying phone call offenses. On balance, the positive factors outweigh the negative factors in assessing respondent's rehabilitation profile. Respondent appears to be taking appropriate steps towards rehabilitation by complying with her criminal probation requirements and by demonstrating attitudinal change regarding her prior criminal conduct, but she has a ways to go.

17. As discussed below, cause exists to discipline respondent's license. Complainant, in closing argument, noted that discipline is warranted but did not make a specific penalty recommendation. Prior to the date of her criminal conduct, respondent had not exhibited any problems related to alcohol consumption or anger management. Nor had any professional discipline issues arisen. Nevertheless, discipline is warranted because respondent's criminal conduct on that occasion reflected a serious lack of judgment which constituted a threat of substantial injury to others. Based on the totality of the evidence presented, while her rehabilitation may not be complete, respondent has established that she has been sufficiently rehabilitated from serious criminal offenses so that she may be allowed to retain licensure on a restricted basis. Therefore, respondent's unrestricted license should be revoked, and she should be issued a restricted license with the restrictions specified in the Order below.

18. Complainant offered declarations that supported investigative costs of \$1,458 and enforcement costs of \$422.75. The reasonableness of the claimed costs was not challenged by respondent, who stipulated that she had the financial ability to pay a cost award.

The Bureau is entitled to recover \$1,880.75 in costs.

LEGAL CONCLUSIONS

1. Business and Professions Code section 493 permits the Bureau to inquire into the circumstances surrounding the commission of a crime, by one of its licensees, to determine if the crime is substantially related to the qualifications, functions, or duties of a real estate licensee. In this case, such an inquiry results in the conclusion that the requisite substantial relationship exists with respect to each of respondent's convictions.

2. A real estate license may be disciplined when the licensee has been convicted of a crime that is substantially related to the qualifications, functions, or duties of a real estate licensee. (Bus. & Prof. Code, §§ 490, subd. (a); 10177, subd. (b).) Respondent was convicted of a drunk driving offense: driving with a blood alcohol level of .08 percent or more, under circumstances wherein her blood alcohol level was measured at .16 percent, twice the legal limit. (Findings 3 and 4.) Such a crime is deemed to be substantially related to the qualifications, functions, or duties of a real estate licensee. (See, Cal. Code Regs., tit. 10, § 2910, subds. (a)(8) ["Doing of any unlawful act . . . with the intent or threat of doing substantial injury to the person or property of another"].) In this instance, by driving in an extremely inebriated condition, respondent's conduct constituted a threat of substantial injury to others. Vehicle Code section 23593, subdivision (a), provides legislative recognition of such a threat: "[I]t is extremely dangerous to human life to drive while under the influence of alcohol." Therefore, respondent's drunk driving offense constitutes cause for license discipline pursuant to Business and Professions Code sections 490, subdivision (a), and 10177, subdivision (b).

3. Respondent was convicted of threatening or annoying phone calls. (Findings 5 and 6.) Such a crime is deemed to be substantially related to the qualifications, functions, or duties of a real estate licensee. (See, Cal. Code Regs., tit. 10, § 2910, subds. (a)(8) ["Doing of any unlawful act . . . with the intent or threat of doing substantial injury to the person or property of another"].) The Board's "substantial relationship" regulation is not limited to crimes involving a specific intent to substantially injure another, as respondent proposes, because the disjunctive "or" encompasses an expressed verbal threat to substantially injure another. (*Donley v. Davi* (2009) 180 Cal.App.4th 447, 465.) In this instance, respondent's annoying and/or threatening phone call offense, by its terms, involved a threat of substantial injury to the person or property of another. Therefore, respondent's threatening or annoying phone call offense constitutes cause for license discipline pursuant to Business and Professions Code sections 490, subdivision (a), and 10177, subdivision (b).

4. A real estate license may be disciplined for failure to report a conviction of any felony or misdemeanor to the Bureau within 30 days. (Bus. & Prof. Code, §10186.1, subds. (a)(1)(B), (a)(2), and (b).) Respondent failed to report her misdemeanor drunk driving conviction, or her threatening or annoying phone call conviction to the Bureau within 30 days. (Finding 7.) Therefore, cause for discipline exists pursuant to Business and Professions Code section 10186.2, subdivisions (a)(1)(B), (a)(2), and (b).

5. A professional license may be disciplined only upon "clear and convincing evidence to a reasonable certainty." (*Ettinger v. Board of Medical Quality Assurance* (1982) 135 Cal. App.3d 853-856.)

6. Clear and convincing evidence established cause for discipline of respondent's license pursuant to Business and Professions Code sections 490, subdivision (a), and 10177, subdivision (b), in that respondent was convicted of crimes substantially related to the qualifications, functions, and duties of a real estate broker, by reason of Findings 3 through 6, and Legal Conclusions 1 through 3.

7. Clear and convincing evidence established cause for discipline of respondent's license pursuant to Business and Professions Code section 10186.2, subdivisions (a)(1)(B), (a)(2), and (b) in that respondent failed to report her misdemeanor convictions to the Bureau within 30 days, by reason of Finding 7, and Legal Conclusion 4.

8. In determining the appropriate discipline, the central question is what level of discipline is necessary to protect the public. Disciplinary proceedings to suspend or revoke a real estate license are not conducted for the primary purpose of punishing an individual. (*Small v. Smith* (1971) 16 Cal. App.3d 450, 457.) Based upon all of the matters set forth in Findings 8 through 18 above, it is determined that it would not be contrary to the public interest to allow respondent to retain her real estate broker license on a restricted basis, on appropriate terms and conditions.

9. Business and Professions Code section 10106 permits the Real Estate Commissioner to request an administrative law judge hearing a disciplinary matter to direct a licensee to pay a sum not to exceed the reasonable costs of investigation and enforcement of the case, except as otherwise provided by law. Evidence is required to support an award.

10. Complainant provided sufficient evidence to support an award of the costs of investigation and enforcement in the amount of \$1,880.75, as set forth in Finding 18.

ORDER

All licenses and licensing rights of respondent Terina Roxsant Pirhofer under the Real Estate law are revoked; provided, however, a restricted real estate broker license shall be issued to respondent pursuant to Business and Professions Code section 10156.5 if respondent makes application therefor and pays to the Bureau of Real Estate the appropriate

fee for the restricted license within 90 days from the effective date of this Decision. The restricted license issued to respondent shall be subject to all of the provisions of section 10156.7 of the Business and Professions Code and to the following limitations, conditions and restrictions imposed under authority of section 10156.6 of that Code:

- a. The restricted license issued to respondent may be suspended prior to hearing by Order of the Real Estate Commissioner in the event of respondent's conviction or plea of nolo contendere to a crime which is substantially related to respondent's fitness or capacity as a real estate licensee.
- b. 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 conditions attaching to the restricted license.
- c. Respondent shall not be eligible to apply for the issuance of an unrestricted real estate license or for the removal of any of the conditions, limitations or restrictions of a restricted license until two years have elapsed from the effective date of this Decision.
- d. Respondent shall, within nine months from the effective date of this Decision, present evidence satisfactory to the Real Estate Commissioner that she has, since the most recent issuance of an original or renewal real estate license, taken and successfully completed the continuing education requirements of Article 2.5 of Chapter 3 of the Real Estate Law for renewal of a real estate license. If respondent fails to satisfy this condition, the Commissioner may order the suspension of the restricted license until the respondent presents such evidence. The Commissioner shall afford respondent the opportunity for a hearing pursuant to the Administrative Procedure Act to present such evidence.
- e. Respondent shall notify the Commissioner in writing within 72 hours of any arrest by sending a certified letter to the Commissioner at the Bureau of Real Estate, Post Office Box 187000, Sacramento, CA 95818-7000. The letter shall set forth the date of respondent's arrest, the crime for which respondent was arrested and the name and address of the arresting law enforcement agency. Respondent's failure to timely file written notice shall constitute an independent violation of the terms of the restricted license and shall be grounds for the suspension or revocation of that license.

///

Respondent Terina Roxsand Pirhofer shall pay \$1,880.75 to the Bureau of Real Estate as its costs of investigation and enforcement of this case.

Dated: February 22, 2018

DocuSigned by:
Wilbert E. Bennett
9E82CEBCC5C4472...

WILBERT E. BENNETT
Administrative Law Judge
Office of Administrative Hearings