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FILED

SEP 23 2019

DEPARTMENT OF REAL ESTATE

By *X. Knapp*

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

In the Matter of the Accusation of:)	
)	DRE No. H-6686 SAC
NATASHA DEE CARLENA DAVIS,)	
)	OAH No. 2018090059
Respondent.)	

ORDER VACATING DECISION AND SETTING ASIDE DEFAULT

On August 8, 2019, a Decision was rendered revoking the real estate salesperson license of Respondent, NATASHA DEE CARLENA DAVIS, effective August 30, 2019.

On August 28, 2019, good cause was presented to vacate the Decision of August 8, 2019, and to have the matter remanded to the Office of Administrative Hearings as a contested matter.

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1 NOW, THEREFORE, IT IS ORDERED that the Decision of August 8, 2019, is
2 vacated and that the Matter of the Accusation filed on March 20, 2019, is remanded to the Office
3 of Administrative Hearings.

4 This Order shall be effective immediately.

5 DATED: September 23, 2019

6 DANIEL J. SANDRI
7 ACTING REAL ESTATE COMMISSIONER

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AUG 29 2019

DEPARTMENT OF REAL ESTATE
By Lu Kuayep

* * *

**EXP REALTY OF CALIFORNIA, INC.,
RAMEY JOSEPH MARQUEZ, SHAUNTAE
NICOLE TEDTAOTAO, VICKI HOUFF, and
NATASHA DEE CARLENA DAVIS,**

DRE NO. H-6686 SAC
OAH NO. 2018090059

Respondent(s).

On August 8, 2019, a Decision as to NATASHA DEE CARLENA DAVIS (DAVIS) only was rendered in the above-entitled matter to become effective August 30, 2019.

On August 28, 2019, Respondent DAVIS filed a Request for Stay of Effective Date so that she may file a Petition for Reconsideration of the Decision of August 8, 2019.

IT IS HEREBY ORDERED that the effective date of August 30, 2019, is stayed for a period of thirty (30) days. The Decision of August 8, 2019, shall become effective at 12 o' clock noon on September 29, 2019.

DATED: August 29, 2019

DANIEL SANDRI
ACTING REAL ESTATE COMMISSIONER

David J. Sand

FILED

AUG 09 2019

DEPARTMENT OF REAL ESTATE

By K. Knappe

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of

eXp REALTY OF CALIFORNIA, INC.,
RAMEY JOSEPH MARQUEZ,
SHAUNTAE NICOLE TEDTAOTAO,
VICKI L. HOUFF and
NATASHA DEE CARLENA DAVIS,

Respondents.

No. H-6686 SAC

AS TO
NATASHA DEE CARLENA
DAVIS ONLY

DECISION

This Decision is being issued in accordance with the provisions of Section 11520 of the Government Code, on evidence of compliance with Section 11505 of the Government Code and pursuant to the Order of Default filed on August 1, 2019, and the findings of fact set forth herein, which are based on one or more of the following: (1) Respondents' express admissions; (2) affidavits; and (3) other evidence.

This Decision revokes real estate licenses on grounds of violations of the Real Estate Law (Part 1 of Division 4 of the California Business and Professions Code).

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

FINDINGS OF FACT

1

On March 20, 2019, TRICIA D. PARKHURST made the Accusation in her official capacity as a Supervising Special Investigator of the State of California against

RESPONDENT NATASHA DEE CARLENA DAVIS (DAVIS). The Accusation, Statement to Respondents, and Notices of Defense were mailed, by certified mail, return receipt requested, to DAVIS' last known mailing addresses on file with the Department of Real Estate (Department) on March 20, 2019.

On August 1, 2019, no Notice of Defense having been received or filed herein within the time prescribed by Section 11506 of the Government Code, DAVIS' default was entered herein.

2

DAVIS was licensed by the Department as a real estate salesperson intermittently from May 7, 2004 until May 5, 2018, when her license expired. DAVIS' license was renewed on January 1, 2019.

3

At all times mentioned, DAVIS engaged in the business of, acted in the capacity of, advertised or assumed to act as a real estate broker in the State of California, within the meaning of Section 10131(a) of the Code, including the operation and conduct of a residential resale brokerage wherein DAVIS bought, sold, or offered to buy or sell, solicited or obtained listings of, and negotiated the purchase, sale or exchange of real property or business opportunities, all for or in expectation of compensation.

4

At all times mentioned herein DAVIS conducted real estate activity on the properties included, but not limited to 11129 Portage River Court, Rancho Cordova, California and 318 Duranta Street, Roseville, California, when she was not licensed.

DETERMINATION OF ISSUES

1

The acts or omissions of NATASHA DEE CARLENA DAVIS, described above, constitute violations of Sections 10130, 10177(d) and 10177(g) of the Code.

2

The standard of proof applied was clear and convincing proof to a reasonable certainty.

ORDER

All licenses and licensing rights of Respondent NATASHA DEE CARLENA
DAVIS, under the provisions of Part I of Division 4 of the Business and Professions Code, are
revoked.

AUG 30 2019

This Decision shall become effective at 12 o'clock noon on _____.

DATED: August 8, 2019.

DANIEL SANDRI
ACTING REAL ESTATE COMMISSIONER



1 Department of Real Estate
2 1651 Exposition, Blvd.
3 Sacramento, CA, 95815

4 Telephone: (916) 576-8700

FILED

AUG 01 2019

DEPARTMENT OF REAL ESTATE

By L. Krapp

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of:)

12 EXP REALTY OF CALIFORNIA INC.,)

DRE No. H-6686 SAC

13 RAMEY JOSEPH MARQUEZ,)

14 SHAUNTAE NICOLE TEDTAOTAO,)

DEFAULT ORDER

15 VICKI HOUFF, and)

16 NATASHA DEE CARLENA DAVIS)

Respondents.)

17 Respondent, NATASHA DEE CARLENA DAVIS, having failed to file a
18 Notice of Defense within the time required by Section 11506 of the Government Code, is
19 now in default. It is, therefore, ordered that a default be entered on the record in this matter.

20 IT IS SO ORDERED AUG 01 2019.

21 DANIEL J. SANDRI

22 ACTING REAL ESTATE COMMISSIONER

23
24 By: JEFFREY OBOYSKI

25 JEFFREY OBOYSKI

26 Assistant Commissioner, Enforcement
27

1 RICHARD K. UNO, Counsel III (SBN 98275)
2 Department of Real Estate
3 P. O. Box 137007
4 Sacramento, CA 95813-7007

5 Telephone: (916) 576-8700
6 (916) 263-3767 (Fax)
7 (916) 576-7848 (Direct)

FILED

MAR 20 2019

DEPARTMENT OF REAL ESTATE
By R. Krapp

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)

12 eXp REALTY OF CALIFORNIA, INC.,)
13 RAMEY JOSEPH MARQUEZ,)
14 SHAUNTAE NICOLE TEDTAOTAO)
15 VICKI L. HOUFF, and NATASHA DEE)
16 CARLENA DAVIS)

17 Respondents.)

NO. H-6686 SAC

FIRST AMENDED ACCUSATION

18
19 The Complainant, TRICIA D. PARKHURST, a Supervising Special Investigator
20 of the State of California, for Accusation against Respondents eXp REALTY OF
21 CALIFORNIA, INC. (ERC), RAMEY JOSEPH MARQUEZ (MARQUEZ), collectively
22 RESPONDENTS, and NATASHA DEE CARLENA DAVIS (DAVIS), is informed and alleges
23 as follows:

24 1

25 The Complainant makes this Accusation against RESPONDENTS in her official
26 capacity.

27 ///

///



2

At all times mentioned herein, ERC was and is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the California business and Professions Code (the Code) by the licensed by the Department of Real Estate (Department) as a corporate real estate broker.

3

At all times mentioned herein, MARQUEZ was licensed by the Department as a real estate broker and as the Designated Officer of ERC.

4

At no time mentioned herein, was "exp realty" licensed as a fictitious business name with the Department.

5

At no time mentioned herein, was Dream Team Sells Homes, Inc. (DTSH), a California Corporation, licensed by the Department as a corporate real estate broker.

6

At all times herein mentioned, MARQUEZ was licensed by the Department as the designated broker/officer of ERC. As the designated broker/officer, MARQUEZ was responsible, pursuant to Section 10159.2 of the Code, for the supervision of the activities of the officers, agents, real estate licensees and employees of ERC for which a real estate license is required.

7

RESPONDENTS engaged in the business of, acted in the capacity of, advertised or assumed to act as a real estate broker in the State of California, within the meaning of Section 10131(a) of the Code, including the operation and conduct of a residential resale brokerage wherein Respondent bought, sold, or offered to buy or sell, solicited or obtained listings of, and negotiated the purchase, sale or exchange of real property or business opportunities, all for or in expectation of compensation.

1 FIRST CAUSE OF ACTION

2 8

3 Complainant refers to Paragraphs 1 through 7 above, and incorporates the same,
4 herein.

5 9

6 Section 10159.6 of the Code, is a recently enacted statute setting forth team name
7 requirements, which provides, in part: "All of the following apply to use of a team name...
8 (b) The responsible broker's identity...shall be displayed as prominently and conspicuously as
9 the team name in all advertising and solicitation materials."

10 10

11 A number of licensees employed by Respondents, on their websites, fail to
12 comply with the requirements set forth above, including but not limited to the following:

13 (a) Broker Associate Thomas Edward Daves' website at www.tdaves.com does
14 not display Exp's name as prominently and conspicuously as his team name.

15 (b) Real estate broker Joseph Peter Parker's websites at
16 www.peterparkerteam.com and www.allsacramentoareahomes.com fails to
17 display eXp's name as prominently and conspicuously as his team name.

18 (c) Real estate broker Daniel Beer's website at www.sandiegohomefinder.com
19 does not display eXp's name as prominently and conspicuously as his team
20 name.

21 (d) Real estate salesperson Bobby John Taylor's website at
22 www.newfamilylegacyt.com does not display eXp's name as prominently and
23 conspicuously as his team name.

24 (e) Broker Associate Kurt Stephen Wannebo's website at www.wanneoreg.com
25 does not display eXp's name as prominently and conspicuously as his team
26 name.
27

The failure of the licensees to comply with Section 10159.6(c) (broker id-team name requirements), as set forth above, demonstrates Respondents' failure to supervise licensees as required by Section 2725 of the Regulations (broker supervision) and Section 10159.6 (responsible broker/directing officer) of the Code and constitute grounds for disciplinary action under the provisions of Section 10177(d) (violate real estate law), 10177 (g) (negligence/incompetence licensee) and 10177(h) (broker supervision) of the Code.

SECOND CAUSE OF ACTION

Complainant refers to Paragraphs 1 through 11, above, and incorporates the same, herein.

A number of licensees employed by Respondents, through Facebook and/or their websites, indicate office addresses that are not licensed as branch offices with the Department, including but limited to those listed below.

- (a) RES Scott Charles Sherman listed 374 Lincoln Center, Stockton, California as his office.
- (b) Broker Associate Jeffrey Allen DeGray listed 6060 Sunrise Vista Drive, #2180, Citrus Heights, California as his office.
- (c) Broker Associate Thomas Edward Daves listed 1478 Stone Pointe Drive, #450 Roseville, California as his office.
- (d) Real estate Salesperson Jacob Lee Swodeck listed 250 West First Street, #318, Claremont, California, as his office.
- (e) Broker Associate John Olfato Lanting listed 1930 Del Paso Road, Suite 121, Sacramento, California as his office.
- (f) Broker Associate Susan Patrice Truax listed 350 Rhode Island Street, San Francisco, California as her office.

- 1 (g) Real estate Luke Edward Middleton listed 5565 La Jolla Mesa, La Jolla,
2 California as his office.
- 3 (h) Real estate salesperson Jessica Marie La Vau listed 25350 Magic Mountain
4 Parkway, Suite 300, Santa Clarita, California as her office.
- 5 (i) Broker associate Alan Zane Savage listed 908 Taylorville Road, Suite 204,
6 Grass Valley, California as his office.
- 7 (j) Real estate salesperson Robert Eric Milse listed 7676 Hazard Center Drive,
8 San Diego, California as his office.
- 9 (k) Real estate broker Robert James Martins listed 12707 High Bluff Drive, Suite
10 200, San Diego, California as his office.
- 11 (l) Real Estate broker Joseph Peter Parker listed 9813 Fair Oaks Boulevard, Suite
12 A, Fair Oaks, California as his office.
- 13 (m) Broker Associate James Elliot Cottrell listed 16990 Washington Street,
14 Riverside, California as his office.
- 15 (n) Real estate salesperson Kevin Michael Kujawa listed 1024 Iron Point Road,
16 Folsom, California as his office.
- 17 (o) Real estate salesperson Michael Lawrence Nichols' lists 6060 Sunrise Vista
18 Drive, Suite 110F, Citrus Heights, California as his office.
- 19 (p) Real estate salesperson Ted Mendoza lists 331 Capitola Avenue, Suite C,
20 Capitola, California as his office.
- 21 (q) Broker Associate Victoria Anne Leas lists 3515 Fair Oaks Blvd., Sacramento,
22 California as her office.

24 The failure of the licensees to comply with Section 10163 (branch office), as set
25 forth above, demonstrates Respondents' failure to supervise licensees as required by Section
26 2725 of the Regulations (broker supervision) and Section 10159.s (responsible broker/directing
27 officer) of the Code and constitute grounds for disciplinary action under the provisions of Section

1 10177(d) (violate real estate law), 10177 (g) (negligence/incompetence licensee) and 10177(h)
2 (broker supervision) of the Code.

3 THIRD CAUSE OF ACTION

4 15.

5 Complainant refers to Paragraph 1 through 14, above, and incorporates the same,
6 herein by reference.

7 16

8 A number of licensees employed by Respondents, through Facebook and/or their
9 websites, used the un-licensed DBA "exp realty" and others, including but not limited to those
10 listed below:

11 (a) Broker Associate Jeffery Allen DeGray on his website

12 www.jeffdegray.com.

13 (b) Broker Associate Thomas Edward Daves, on his website

14 www.tdaves.com.

15 (c) Real estate salesperson Jacob Lee Swodeck on his website

16 www.theswodeckgroup.com.

17 (d) Broker Associate John Olfato Lanting on his website www.johnlanting
18 homes.com.

19 (e) Broker Associate Susan Patice Truax on her Facebook page.

20 (f) Broker Associate Alan Zane Savage on his Facebook page.

21 (g) Real Estate salesperson Robert Eric Milse on his facebook page.

22 (h) Real estate broker Robert James Martins on his website

23 www.moveupsandiego.com.

24 (i) Broker Associate James Elliot Cottrell on his website

25 www.jamesforhomes.com.

26 (j) Real estate salesperson Kevin Michael Kujawa on his Facebook page.
27

- 1 (k) Real estate salesperson Michael Lawrence Nichols on his website
2 www.nichols-realty.com.
- 3 (l) Real estate salesperson Ted Mendoza on his website
4 www.tedmendoza.com.
- 5 (m) Broker Associate Jeffrey Allen Russel on his website [www.buy-sell-](http://www.buy-sell-california-homes.com)
6 [california-homes.com](http://www.buy-sell-california-homes.com).
- 7 (n) Real Estate broker Karen Ray Bartlett on her website
8 www.greatersacramentareahomes.com.
- 9 (o) Real estate broker Ellen Herrle on her website
10 www.ronellenherrle.exprealty.com.
- 11 (p) Broker Associate Sean C. G. Work on his website
12 www.swork.exprealty.com.
- 13 (q) Real estate salesperson Daniel Beer on his website www.sandiego
14 [homefinder.com](http://www.sandiego-homefinder.com).
- 15 (r) Real estate salesperson Francine Teresa Martinez on her Facebook page.
- 16 (s) Broker Associate Janet DePerry on her Facebook page and on her website
17 www.beachstoneproperties.com.
- 18 (t) Broker Associate Deborah Lynn Penny on her website
19 www.debbiepenny.exprealty.com.
- 20 (u) Broker Associate Nelida Mora on her website
21 www.thehousehuntergroup.com.
- 22 (v) Real estate salesperson Kathy Rolfo on her website www.kathyrolfo.com.
- 23 (w) Real estate salesperson Robert Jerome Costello on his website
24 www.robcostelloproperties.com.
- 25 (x) Real estate salesperson Bobby John Taylor on his website
26 www.btaylor.exprealty.com.
- 27

1 (y) Broker Associate James Michael Guido on his website www.the
2 guidogroup.exprealty.com.

3 (z) Broker Associate Victoria Anne Lease on Facebook and her website
4 www.findsacramentohomes.com and www.victoriasproperty.com used the
5 fictitious name "The Victoria's Properties Team".

6 17

7 The failure of the licensees to comply with Section 2731 (fictitious name), of the
8 Regulations, as set forth above, demonstrates Respondents' failure to supervise licensees as
9 required by Section 2725 of the Regulations (broker supervision) and Section 10159.6
10 (responsible broker/directing officer) of the Code and constitute grounds for disciplinary action
11 under the provisions of Section 10177(d) (violate real estate law), 10177 (g)
12 (negligence/incompetence licensee) and 10177(h) (broker supervision) of the Code.

13 FOURTH CAUSE OF ACTION

14 18

15 Complainant refers to Paragraphs 1 through 17, above, and incorporates the same,
16 herein, by reference.

17 19

18 Section 10159.6 of the Code states, in part: "All of the following apply to use of a
19 team name...Advertising and solicitation material that contain a team name, including print or
20 electronic media shall include, and display in a conspicuous and prominent manner, the team
21 name and the name and license number of at least one of the licensed members of the team".

22 20

23 A number of licensees employed by Respondents on their websites and/or
24 Facebook page, fail to comply with the requirement set forth above by not listing a license
25 number on advertising, including but not limited to the following:

26 (a) Real estate salesperson Jacob Lee Swodeck and real estate salesperson Jonathan
27 Michael Bunass on their website.

- 1 (b) Broker Associate John Olfato Lanting on his Facebook page.
- 2 (c) Broker Associate Susan Patrice Truax on her Facebook page.
- 3 (d) Real estate salesperson Luke Edward Middleton on his Facebook page and website
- 4 www.themiddletongroupsd.com.
- 5 (e) Real estate salesperson Jessica Marie La Vau on her Facebook page.
- 6 (f) Broker Associate Alan Zane Savage on his Facebook page.
- 7 (g) Real estate salesperson Robert Eric Milse on his Facebook page.
- 8 (h) Real Estate broker Robert James Martin on his website www.moveupsandiego.com.
- 9 (i) Real estate salesperson Kevin Michael Kujawa on his Facebook page.
- 10 (j) Real estate salesperson Michael Lawrence Nichols on his Facebook page and on his
- 11 website www.nichols-realty.com.
- 12 (k) Broker Associate Jeffrey Allen Russell on his website [www.buy-sell-california-](http://www.buy-sell-california-homes.com)
- 13 [homes.com](http://www.buy-sell-california-homes.com).
- 14 (l) Real estate broker Karen Ray Bartlett on her website
- 15 www.greatersacramentoareahomes.com.
- 16 (m) Broker Associate Sean C.G. Work on her Facebook page.
- 17 (n) Real estate salesperson Francine Teresa Martinez on her Facebook page.
- 18 (o) Broker Associate Nelida Mora on her website www.thehousehuntergroup.com.
- 19 (p) Real estate salesperson Kathy Rolfo on her Facebook page.
- 20 (q) Real estate salesperson Bobby John Taylor on his website
- 21 www.btaylor.exprealty.com.
- 22 (r) Broker Associate James Michael Guido on his website
- 23 [www.theguidogroup\[.exprealty.com](http://www.theguidogroup[.exprealty.com).
- 24 (s) Broker Associate Kurt Stephen Wannebo on his website www.wanneboreg.com.
- 25 (t) Broker Associate Michael Lee Bjorkman on his website www.teambjorkman.com.
- 26 (u) Broker Associate Gregory Thomas McDaniel on his Facebook page.
- 27 (v) Broker Associate Victoria Anne Leas on her Facebook page.

The failure of the licensees to comply with Section 10159.6(a) (license number-team name requirements), as set forth above, demonstrates Respondents' failure to supervise licensees as required by Section 2725 of the Regulations (broker supervision) and Section 10159.s (responsible broker/directing officer) of the Code and constitute grounds for disciplinary action under the provisions of Section 10177(d) (violate real estate law), 10177 (g) (negligence/incompetence licensee) and 10177(h) (broker supervision) of the Code.

FIFTH CAUSE OF ACTION

Complainant refers to Paragraphs 1 through 21, above, and incorporates the same, herein, by reference.

Respondents failed to notify the Department that they hired licensees as required by Section 10161.8, including, but not limited to the following:

- (a) Robert James Martins
- (b) Joseph Peter Parker
- (c) Karen Ray Bartlett
- (d) Ellen Herrle
- (e) Joseph Geral Stillwagon II.

The above acts and/or omissions of MARQUEZ violate Section 10159.2 (responsibility/directing officer) of the Code and Section 2725 (broker supervision) of the Regulations and constituted grounds for disciplinary action under the provisions of Section 10177(d) (willful disregard/violation of Real Estate Law) and 10177(h) (broker supervision) of the Code.

1 SIXTH CAUSE OF ACTION

2 25

3 Complainant refers to Paragraphs 1 through 24, above, and incorporates the same,
4 herein, by reference.

5 26

6 Natasha Dee Carlana Davis' real estate salesperson license expired on May 5,
7 2018, and was not renewed until January 1, 2019.

8 27

9 During the time that Davis was not licensed she conducted real estate activity on
10 the properties included, but not limited to 11129 Portage River Court, Rancho Cordova,
11 California and 318 Duranta Street, Roseville, California 95678.

12 28

13 The above acts and/or omissions of MARQUEZ violate Section 10159.2
14 (responsibility/directing officer) of the Code and Section 2725 (broker supervision) of the
15 Regulations and constituted grounds for disciplinary action under the provisions of Section
16 10177(d) (willful disregard/violation of Real Estate Law) and 10177(h) (broker supervision) of
17 the Code.

18 29

19 The above acts and/or omissions of DAVIS violate Section 10130 (license
20 required) of the Code and constitute grounds for disciplinary action under the provisions of
21 Sections 10177(d) and 10177(g) of the Code.

22 SEVENTH CAUSE OF ACTION

23 30

24 Complainant refers to Paragraphs 1 through 29, above, and incorporates the same,
25 herein, by reference.

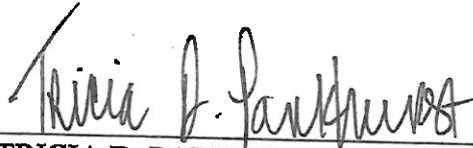
At all times herein above mentioned, MARQUEZ was responsible as the designated officer for ERC, for the supervision and control of the activities conducted on behalf of ERC's business by its employees. MARQUEZ failed to exercise reasonable supervision and control over the real estate activities of ERC. In particular, MARQUEZ permitted, ratified and/or caused the conduct described above, to occur, and failed to take reasonable steps, including but not limited to handling of trust funds, supervision of employees, and the implementation of policies, rules, and systems to ensure the compliance of the business with the Real Estate Law and the Regulations.

The above acts and/or omissions of MARQUEZ violate Section 10159.2 (responsibility/directing officer) of the Code and Section 2725 (broker supervision) of the Regulations and constituted grounds for disciplinary action under the provisions of Section 10177(d) (willful disregard/violation of Real Estate Law) and 10177(h) (broker supervision) of the Code.

Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, the commissioner may request the administrative law judge to direct a licensee found to have committed a violation of this part to pay a sum not to exceed the reasonable costs of the investigation and 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 licenses and license rights of Respondent under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code), for the cost of investigation, cost of enforcement of this action, the cost of the audit, and for such other and further relief as may be proper under other provisions of law.

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TRICIA D. PARKHURST
Supervising Special Investigator

Dated at Sacramento, California,
this 13th day of March, 2019.

DISCOVERY DEMAND

The Department of Real Estate hereby requests discovery pursuant to Section 11507.6 of the California Government Code. Failure to provide discovery to the Department may result in the exclusion of witnesses and/or documents at the hearing, and other sanctions as the Administrative Law Judge deems appropriate.