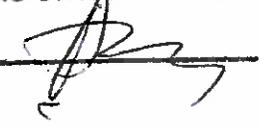


5/26/18

FILED

1 STEVE CHU, Counsel (SBN 238155)
2 Department of Real Estate
3 320 West 4th Street, Suite 350
4 Los Angeles, California 90013-1105

SEP 26 2018
BUREAU OF REAL ESTATE

By 

4 Telephone: (213) 620-6430
5 Fax: (213) 576-6917
6
7
8

9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-41020 LA
13)
14 ANTONIA HENRIETTA PAPADATOS,) FIRST AMENDED
15) ACCUSATION
Respondent.)
_____)

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 Alwaysz 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

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. FVII402819. 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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9.

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.

10.

Code section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department of Real Estate, 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 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.

Dated at Los Angeles, California
this 26th day of September, 2018.


Maria Suarez
Supervising Special Investigator

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cc: ANTONIA HENRIETTA PAPADATOS
Maria Suarez
Sacto.