

## WISCONSIN DEPARTMENT OF SAFETY AND PROFESSIONAL SERVICES



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DIVISION OF LEGAL SERVICES & COMPLIANCE  
DEPT. OF SAFETY & PROFESSIONAL SERVICES



**Before the  
State Of Wisconsin  
Real Estate Examining Board**

In the Matter of the Disciplinary Proceedings  
Against Terrell Bell, Respondent

FINAL DECISION AND ORDER

Order No. **ORDER 0008730**

**Division of Legal Services and Compliance Case No. 21 REB 057**

The State of Wisconsin, Real Estate Examining Board, having considered the above-captioned matter and having reviewed the record and the Proposed Decision of the Administrative Law Judge, make the following:

**ORDER**

NOW, THEREFORE, it is hereby ordered that the Proposed Decision annexed hereto, filed by the Administrative Law Judge, shall be and hereby is made and ordered the Final Decision of the State of Wisconsin, Real Estate Examining Board.

The rights of a party aggrieved by this Decision to petition the department for rehearing and the petition for judicial review are set forth on the attached "Notice of Appeal Information."

Dated at Madison, Wisconsin on the 30th day of August, 2023.

A handwritten signature in cursive script, appearing to read "Al Rehman".

**DSPS Chief Legal Counsel,  
Delegates**

**Member**

**Real Estate Examining Board**



Before The  
**State Of Wisconsin**  
**DIVISION OF HEARINGS AND APPEALS**

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In the Matter of Disciplinary Proceedings  
Against Terrell Bell, Respondent

DHA Case No. SPS-23-0004  
DLSC Case No. 21 REB 057

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**PROPOSED DECISION AND ORDER**

The parties to this proceeding for purposes of Wis. Stat. §§ 227.47(1) and 227.53 are:

Terrell Bell  
2953 N. 58th St.  
Milwaukee, WI 53210

Wisconsin Real Estate Examining Board  
P.O. Box 8366  
Madison, WI 53708-8366

Department of Safety and Professional Services, Division of Legal Services and  
Compliance, by

Attorney Jon Derenne  
Department of Safety and Professional Services  
Division of Legal Services and Compliance  
P.O. Box 7190  
Madison, WI 53707-7190

**PROCEDURAL HISTORY**

On January 19, 2023, the Department of Safety and Professional Services (Department), Division of Legal Services and Compliance (Division), filed and served the Notice of Hearing and Complaint on Terrell Bell (Respondent), by both certified and regular first-class mail, consistent with Wis. Admin. Code § SPS 2.08. The Respondent did not file an answer to the Complaint, as required by Wis. Admin. Code § SPS 2.09(4). At the prehearing conference on March 1, 2023, the Respondent was ordered to file an answer no later than March 21, 2023, and an adjourned prehearing conference was scheduled for April 3, 2023. No answer was filed, and the Respondent failed to appear at the adjourned prehearing conference.

The Division moved for default pursuant to Wis. Admin. Code § SPS 2.14 and Wis. Admin. Code § HA 1.07(3)(c). In light of the Respondent's failure to file an answer to the Complaint and failure to appear for the April 3, 2023 prehearing conference, the Administrative Law Judge (ALJ) found the Respondent to be in default and issued a Notice of Default and Order

on April 4, 2023. Consistent with the order, the Division timely filed a recommended proposed decision and order.

### FINDINGS OF FACT

#### Facts Related to the Alleged Violations

Findings of Facts 1-14 are set forth in the Division's Complaint against the Respondent filed in this matter.

1. Respondent Terrell Bell (Birth Year 1976) is licensed by the State of Wisconsin as a real estate salesperson, having license number 57680-94, first issued on August 20, 2003 and expired as of December 15, 2020. Pursuant to Wis. Stat. § 440.08(3), Respondent retains the right to renew that credential until December 14, 2025. Respondent's most recent address on file with the Wisconsin Department of Safety and Professional Services (Department) is in Mequon, Wisconsin 53209.

2. On June 8, 2021, the Department received a complaint alleging that Respondent had defrauded Complainant in the purchase of a property located at 3371 N. 40<sup>th</sup> St. in Milwaukee, Wisconsin. The Division of Legal Services and Compliance subsequently opened Case Number 21 REB 057 for investigation.

3. On October 3, 2020, Respondent submitted an offer to purchase the subject property on behalf of Real Property Enterprises for \$30,000. Respondent drafted the offer and signed it as the buyer. The offer was accepted contingent on probate proceedings, and was slated to close on December 1, 2020. The transaction did not close, however.

4. Respondent's former managing broker alleges that Respondent was a shareholder or owner of Real Property Enterprises. A review of Respondent's LinkedIn profile indicates that he was a real estate consultant for Real Property Enterprises at all times relevant to this complaint.

5. On October 12, 2020, Respondent drafted an offer to purchase the subject property on behalf of Complainant, and submitted it to Real Property Enterprises, which was represented to Complainant as the seller of the property. Real Property Enterprises "accepted" the offer on October 14, 2020, and closing was set for December 14, 2020. The purchase price was to be \$70,000, and a deposit of \$10,000 in the form of a cashier's check was collected and cashed on October 15, 2020.

6. At closing on December 14, 2020, Respondent collected a closing payment in the form of another cashier's check for \$10,000 and signed a land contract with Complainant.

7. According to Department records, Respondent's real estate salesperson license expired on December 15, 2020, and has not been renewed to date.

8. Respondent's former managing broker claims that Respondent's affiliation with her brokerage was terminated as of December 16, 2020. She stated that she had been unaware of the transaction between Respondent and Complainant, and that the transaction was done outside

of the scope of Respondent's employment. The transaction documents were never uploaded for review, nor were the two \$10,000 payments deposited into the brokerage trust account.

9. On January 27, 2021, Respondent provided Complainant with a cancellation agreement and mutual release and informed Complainant the property was being taken off the market, and that Complainant's \$20,000 would be returned to him. Complainant signed the document, but his money had not been refunded as of the filing of his complaint with the Department on June 8, 2021.

10. A review of City of Milwaukee property records revealed that neither Respondent, nor Real Property Enterprises, nor anyone else known to be affiliated with Real Property Enterprises, has ever owned the subject property.

11. On June 11 and 28, and July 7, 2021, the Division sent letters to Respondent at his address of record requesting a response to the complaint. No response was received.

12. On November 1, 2021, the Division sent an email and a certified letter to Respondent at his addresses of record with the Department seeking the same. No response was received.

13. On November 26, 2021, the Division sent another certified letter to Respondent. A mail receipt was returned and signed by "Mitchell Smithy." No response was received.

14. On September 29, 2022, a Division investigator performed online research to identify other possible contact information for Respondent. That same day, an email and another certified letter were sent to the alternate contact information found. No response has been received to date.

#### Facts Related to Default

15. On January 19, 2023, the Department served the Notice of Hearing and the Complaint on the Respondent by both certified and regular mail. The Respondent did not file an answer to the Complaint.

16. Following the expiration of the 20-day period to file an answer, the ALJ scheduled a telephone prehearing conference for March 1, 2023, at 10:00 a.m. Notice of this prehearing conference was sent to all parties.

17. The Respondent appeared at the prehearing conference and claimed not to have received the complaint or notice of hearing. The Respondent updated his mailing and email address. The ALJ ordered the Respondent to provide a written answer to the Complaint by March 21, 2023, and adjourned the preconference hearing until April 3, 2023 at 10:00 a.m. Notice of this order, and the adjourned prehearing conference, was sent to the Respondent at the updated address he provided.

18. The Respondent failed to file an Answer to the Complaint.

19. On April 3, 2023, the Respondent failed to appear at the prehearing conference. The ALJ attempted to contact the Respondent via telephone and email. The Respondent did not respond to the email or call the ALJ.

20. On April 3, 2023, the Division moved for default based on the Respondent's failure to file an answer to the Complaint and failure to appear at the prehearing conference, pursuant to Wis. Admin. Code § SPS 2.14 and Wis. Admin. Code § HA 1.07(3)I.

21. On April 4, 2023, the ALJ issued a Notice of Default and Order finding that the Respondent was in default and requiring the Division to file and serve, no later than May 3, 2023, a recommended proposed decision and order. The Division timely filed its recommended proposed decision and order.

### DISCUSSION AND CONCLUSIONS OF LAW

#### Jurisdictional Authority

The Wisconsin Real Estate Examining Board (Board) has the authority to impose discipline against the Respondent. Wis. Stat. § 452.14(3). The undersigned ALJ has authority to preside over this disciplinary proceeding in accordance with Wis. Stat. § 227.46(1). Wis. Admin. Code § SPS 2.10(2).

#### Default

The Division properly served the Notice of Hearing and the Complaint upon the Respondent by mailing copies to his last known address. Wis. Stat. § 440.11(2). Service by mail is complete upon mailing. Wis. Admin. Code § SPS 2.08(1).

An answer to a complaint shall be filed within 20 days from the date of service of the complaint. Wis. Admin. Code § SPS 2.09(4). If a respondent "fails to answer as required by s. SPS 2.09 or fails to appear at the hearing at the time fixed therefor, the respondent is in default and the disciplinary authority may make findings and enter an order on the basis of the complaint and other evidence." Wis. Admin. Code § SPS 2.14.

For a telephone prehearing, the administrative law judge may find a failure to appear grounds for default if any of the following conditions exist for more than ten minutes after the scheduled time for prehearing conference: (1) the failure to provide a telephone number to the ALJ after it had been requested; (2) the failure to answer the telephone; (3) the failure to free the line for the proceeding; and (4) the failure to be ready to proceed with the prehearing conference as scheduled. Wis. Admin. Code § HA 1.07(3)(c).

Here, the Respondent failed to file an answer to the Complaint, failed to appear at the prehearing conference on April 3, 2023, failed to answer the telephone with the ALJ called, and failed to be ready to proceed with the prehearing conference as scheduled. Therefore, the Respondent is in default and findings may be made, and an order may be entered, based on the Complaint. *See* Wis. Admin. Code § SPS 2.14; Wis. Admin. Code § HA 1.07(3)(b) and (c).

### Violations

The Board may “revoke, suspend, or limit the license of any licensee, or reprimand the licensee” if it finds that the licensee has violated one or more violations of this subchapter. Wis. Stat. § 452.14(3). Conduct that is grounds for the Board to take disciplinary action includes:

- (1) Making substantial misrepresentations while acting as an agent in a transaction injurious to a party. Wis. Stat. § 452.14(3)(b).
- (2) Drafting or using a document that the licensee knows falsely portrays an interest in real estate. Wis. Admin. Code § REEB 24.085.
- (3) Failing within a reasonable time to account for or remit moneys coming into a licensee’s possession which belong to another person. Wis. Stat. § 452.14(3)(h).
- (4) Demonstrating incompetency to act as a salesperson in a manner which safeguards the interests of the public. Wis. Stat. § 452.14(3)(i).
- (5) Failing to provide brokerage services honestly, fairly, and with reasonable skill and care. Wis. Stat. §§ 452.133(1)(a) and (b).
- (6) Failing to protect the public against fraud, misrepresentation, and unethical practices. Wis. Admin. Code § REEB 24.03(2)(b).
- (7) Engaging in the practice of real estate without a valid license. Wis. Stat. § 452.03(1).
- (8) Engaging in independent real estate practice as a salesperson. Wis. Stat. § 452.30(7)(b).
- (9) Failing to respond to Department or Board requests for information within 30 days of the date of the request. Wis. Admin. Code § REEB 24.17(5).

The Respondent engaged in conduct that constitutes grounds for disciplinary action under Wis. Stat. § 452.14(3)(b) when he made multiple misrepresentations to buyers that resulted in material harm to them. A licensee is prohibited from making “any substantial misrepresentation with reference to a transaction injurious to a party in which the licensee acts as agent.” Wis. Stat. § 452.14(3)(b). The facts establish that Respondent attempted to sell the buyers a property that he knew was not owned by the purported seller. He knew the seller did not own the property because he had drafted an offer for the seller to purchase the property a week before drafting the offer for the buyers. Even if he thought the transaction involving the first offer would close before the second transaction, he still proceeded to go to a closing with buyers after the first offer did not close. The Respondent knew the buyers were purchasing nothing, accepted a \$10,000 payment from them at the closing table, and entered into a land contract. Later, he told the buyers that the \$20,000 in deposits they made as part of the transaction would be returned upon their signing a cancellation agreement and mutual release (CAMR), but the Respondent did not return these funds.<sup>1</sup> His misrepresentations resulted in material harm to the buyers in the form of them paying \$20,000 for the privilege to purchase a home that the seller did not have the right to sell, and that the seller did not in fact deliver to them.

A licensee is prohibited from drafting or using “any document that the licensee knows falsely portrays an interest in real estate.” Wis. Admin. Code § REEB 24.085. The Respondent violated this provision when he drafted and submitted an offer on behalf of the buyers to

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<sup>1</sup> The Respondent had not returned these funds as of the date the buyers filed their complaint with DSPS (June 8, 2021). There is pending civil litigation in Milwaukee County Circuit Court over this matter. 2022CV003551 Tony Pierce vs. Terrell Bell et al.

purchase property that he knew the seller did not own. Therefore, he drafted a document that falsely portrayed an interest in real estate.

The Respondent violated Wis. Stat. § 452.14(3)(h) by failing to refund the buyers' \$20,000 within a reasonable time. The CAMR was executed on January 27, 2021. As of the date of the Complaint, these funds were still not remitted.

By these misrepresentations, false documents, and failure to return the buyer's money, the Respondent demonstrated that he is incompetent to act as a real estate salesperson in a way that will safeguard the interests of the public, violating Wis. Stat. § 452.14(3)(i). Instead, he demonstrated that he is willing to, and in fact has, acted in a way that causes material harm to the public. Additionally, his attempt to sell a property that he knew the seller did not own, and his failure to return the buyers' deposits, demonstrates an inability to provide brokerage services honestly and fairly and with reasonable skill and care, pursuant to Wis. Stat. § 452.133(1)(a) and (b). These actions also show a clear disregard for his obligation to protect the public from fraud, misrepresentation, and unethical practices as required under Wis. Admin. Code § REEB 24.03(2)(b).

The Respondent violated Wis. Stat. § 452.03(1) by engaging in the practice of real estate without a valid license. Current licensure to engage in the practice of real estate as either a broker or a salesperson. Wis. Stat. § 452.03(1). Activity that requires a license includes, "[f]or another person, and for commission, money, or other thing of value, negotiat[ing] or offer[ring] or attempt[ing] to negotiate, whether directly or indirectly, a sale, exchange, purchase, or rental of, or the granting or acceptance of an option to sell, exchange, purchase, or rent, an interest or estate in real estate." Wis. Stat. § 452.01(2)(a). The Respondent's real estate salesperson license expired on December 15, 2020. Subsequently, he negotiated a CAMR on behalf of the seller, Real Property Enterprises, and the buyers, which was executed on January 17, 2021. Although the Respondent may be an owner or employee of Real Property Enterprises, the transaction documents point to Jaswinder Kaur as the authorized seller. While it is unclear whether the Respondent intended to earn a commission on the transaction or was being paid wages or profit sharing by Real Property Enterprises, he received \$20,000 from the buyers as part of the transaction. Therefore, the Respondent negotiated on another's behalf of the sale or purchase of real estate in exchange for something of value after his license had expired, which constitutes engaging in the practice without a valid license.

Licensed as real estate salespersons are prohibited from engaging in independent real estate practice. Wis. Stat. § 452.30(7)(b). The Respondent's former managing broker stated that she had not been informed of the transaction between the Respondent and Complainant and never received the transaction documents for review. She claims that the Respondent entered into this transaction on his own, and outside of the scope of his employment with her. Therefore, the undisputed facts show that he engaged in independent real estate practice as a salesperson in violation of state law.

Finally, the Respondent's pervasive failure to timely respond to requests from the Department constitute violations of Wis. Admin. Code § REEB 24.17(5), which requires real estate salespersons to respond to the Department or Board regarding any request for information within 30 days of the request. The Department attempted to reach the Respondent multiple times between June 11, 2021 and September 29, 2022. This includes certified letters and emails to his

addresses of record with the Department, in addition to attempts to contact him at other addresses where he was suspected to reside. Even if the Respondent did not receive these contacts because he no longer resided at the location of record, it is his responsibility to keep the Department apprised of the current address where he can receive correspondence, pursuant to Wis. Stat. § 440.11(1).

By engaging in conduct qualifying as grounds for taking disciplinary action on his license, along with the Respondent's failure to make any argument to the contrary, the Respondent is subject to discipline pursuant to Wis. Stat. § 452.14(3).

### Discipline

The Division requests that the Respondent's right to renew his real estate salesperson license be revoked. Because the Respondent has been found in default, and because the recommended discipline is consistent with the purposes articulated in *Aldrich* and with case law, I adopt the Division's recommendation.

The three purposes of discipline in a professional misconduct case are: (1) to promote the rehabilitation of the credential holder; (2) to protect the public from other instances of misconduct; and (3) to deter other credential holders from engaging in similar conduct. *State v. Aldrich*, 71 Wis. 2d 206, 237 N.W.2d 689 (1976). "Protection of the public is the purpose of requiring a license." *State ex rel. Green v. Clark*, 235 Wis. 628, 631, 294 N.W. 25 (1940). When a license is granted to an individual, Wisconsin is assuring the public that the licensed individual is competent in his or her profession. *Stringez v. Dep't of Regulation & Licensing Dentistry Examining Bd.*, 103 Wis. 2d 281, 287, 307 N.W.2d 664 (1981). It follows that if the state cannot assure the public of the licensee's competence to practice the profession, then revocation is appropriate. *Gilbert v. State Medical Examining Bd.*, 119 Wis. 2d 168, 189–90, 349 N.W.2d 68 (1984).

The allegations in the Complaint are serious. Licensed real estate professionals are expected to provide brokerage services competently, honestly, and in a way that safeguards the public from fraud and other unethical conduct. Contrary to this, the Respondent engaged in behavior reflecting that he is incompetent, dishonest, and incapable of protecting the public from harm. The Respondent used his position to put into action a scheme to defraud buyers by selling them a property that he knew the seller had no legal claim to, and then refused to return their deposit money when he inevitably was unable to deliver on the sale. Accordingly, the Board cannot assure the public of the Respondent's competency to practice real estate in the state of Wisconsin.

The Respondent has also ignored the Department's legitimate authority. He engaged in the practice of real estate brokerage while his license issued by the Department was expired, in addition to practicing beyond the scope of his license by entering into a transaction independently, without the guidance of a supervising broker. Further, he declined to respond to any requests for information by the Department. The Respondent's lack of accountability was further demonstrated in this proceeding, in which he did not participate even after he clearly was informed of the proceedings and given an opportunity to do so.

While the Respondent's license is currently expired, it is appropriate and necessary to impose discipline. Wisconsin Stat. § 440.08(3)(a) allows the holder of a credential to restore the

credential even after expiration by simply paying the application renewal fee and a late renewal penalty of \$25. The Department is empowered with the ability to promulgate rules requiring credential holders who have failed to renew the credential for five (5) years to complete additional requirements to restore their licenses. *See* Wis. Stat. § 440.08(3)(b). Read together, these provisions have been interpreted by the Department to mean that credential holders retain a right to automatically renew their credentials within five (5) years of expiration by simply paying the required fees. Thus, the Respondent has a right to renew his license until December 14, 2025. Even though the Respondent's license is expired, the fact that he retains a right to renew makes the reasoning for discipline against active licensees equally appropriate to discipline against expired licensees. *See In the Matter of Disciplinary Proceedings Against Stephanie Y. Gaines, L.P.N.*, and *In the Matter of Disciplinary Proceedings Against Kelly L. Kowalkowski, R.N.*

Promoting rehabilitation is one of the purposes of discipline; however, rehabilitation is unknown here. Because the Respondent will not submit to the Board's authority, it is contrary to public safety for the Respondent to continue to hold a credential. Notably, the Respondent has failed to present any mitigating factors as to why he should be trusted to practice real estate or that rehabilitation would be possible. Revocation of the Respondent's right to renew his credential would coincide with the strong precedent that the requirements of licensure are to be taken seriously and that cooperation with licensing proceedings by the Board is required in all instances. *See, e.g. In the Matter of Disciplinary Proceedings Against Mike Mendez*, Order No. 0004882 (Aug. 18, 2016), *In the Matter of Disciplinary Proceedings Against Timothy D. Russell*, Order No. 0004883 (Aug. 18, 2016), *In the Matter of Disciplinary Proceedings Against Casey J. Ehler*, Order No. 0004756 (June 10, 2016), *In the Matter of Disciplinary Proceedings Against Tiffny L. Harden*, Order No. 0005613 (Feb. 2, 2018). Moreover, revocation in this case is necessary to deter other licensees from refusing to cooperate with the Board as it relates to a disciplinary matter and for serious incidents of public harm. Licensees need to know this conduct will not be tolerated.

Considering the facts of this case and the factors set forth in *Aldrich*, revocation of the Respondent's right to renew his real estate credential is reasonable and warranted.

### Costs

The Board is vested with discretion concerning whether to assess all or part of the costs of this proceeding against the Respondent. *See* Wis. Stat. § 440.22(2). In exercising such discretion, the Board must look at aggravating and mitigating facts of the case; it may not assess costs against a licensee based solely on a "rigid rule or invocation of an omnipresent policy," such as preventing those costs from being passed on to others. *Noesen v. State Department of Regulation & Licensing, Pharmacy Examining Board*, 2008 WI App 52, ¶¶ 30-32, 311 Wis. 2d 237, 751 N.W.2d 385. In previous orders, the Board has also considered the following factors when determining if all or part of the costs should be assessed against a respondent: (1) the number of counts charged, contested and proven; (2) the nature and seriousness of the misconduct; (3) the level of discipline sought by the prosecutor; (4) the respondent's cooperation with the disciplinary process; (5) prior discipline, if any; (6) the fact that the Department is a program revenue agency, funded by other licensees; and (7) any other relevant circumstances. *See In the Matter of Disciplinary Proceedings against Elizabeth Buenzli-Fritz*, LS0802183 CHI (Aug. 14, 2008). It is within the Board's discretion as to which, if any, of these factors to

consider, whether other factors should be considered, and how much weight to give any factors considered.

The following facts are particularly relevant to the instant case in light of the factors determined in *Buenzli-Fritz*. The Division proved every count it alleged. This is not a case where the Division wasted resources or incurred additional costs by alleging multiple counts and then failing to prove those counts. Additionally, the Respondent's conduct and violations are serious and a danger to the public. The Respondent failed to cooperate with the Department's investigation. As a result, the Division sought a revocation of the Respondent's credential. The revocation of a credential equates to the general absence of mitigating factors in this case. The Respondent, by nature of being in default, has made no argument concerning whether costs should be assessed against him. When the Respondent fails to argue a position, the Division is not obliged to make the argument for them. Finally, the Department is a program revenue agency whose operating costs are funded by the revenue received from credential holders. Therefore, it is appropriate for the Respondent to pay the full costs of the investigation and this proceeding, as determined pursuant to Wis. Admin. Code § SPS 2.18.

#### CONCLUSIONS OF LAW

1. The Wisconsin Real Estate Examining Board (Board) has jurisdiction over this matter pursuant to Wis. Stat. § 452.14(3).
2. The Respondent engaged in conduct that constitutes grounds for disciplinary action under Wis. Stat. § 452.03(1) by engaging in the practice of real estate without a valid license.
3. The Respondent engaged in conduct that constitutes grounds for disciplinary action under Wis. Stat. § 452.133(1)(a) by failing to provide brokerage services honestly, fairly, and with reasonable skill and care.
4. The Respondent engaged in conduct that constitutes grounds for disciplinary action under violated Wis. Stat. § 452.14(3)(b) by making substantial misrepresentations as an agent in a transaction injurious to a party.
5. The Respondent engaged in conduct that constitutes grounds for disciplinary action under Wis. Stat. § 452.14(3)(h) by failing within a reasonable time to account for or remit money that was in his possession which belonged to another person.
6. The Respondent engaged in conduct that constitutes grounds for disciplinary action under Wis. Stat. § 452.14(3)(i) by demonstrating incompetency to act as a salesperson in a manner which safeguards the interests of the public.
7. The Respondent engaged in conduct that constitutes grounds for disciplinary action under Wis. Stat. § 452.30(7)(b) by engaging in independent real estate practice as a salesperson.
8. The Respondent engaged in conduct that constitutes grounds for disciplinary action under Wis. Admin. Code § REEB 24.03(2)(b) by failing to protect the public against fraud, misrepresentation, and unethical practices.

9. The Respondent engaged in conduct that constitutes grounds for disciplinary action under Wis. Admin. Code § REEB 24.085 by drafting and using a document that he knew falsely portrayed an interest in real estate.
10. The Respondent engaged in conduct that constitutes grounds for disciplinary action under Wis. Admin. Code § REEB 24.17(5) by failing to respond to Department's requests for information within 30 days.
11. As a result of the above violations, revocation of the Respondent's right to renew his license is reasonable and appropriate. Wis. Stat. §§ 452.14(3).
12. The Division of Hearings and Appeals has authority to issue this proposed decision pursuant to Wis. Stat. § 227.46 and Wis. Admin. Code § SPS 2.10.


ORDER

Accordingly, it is hereby ORDERED that the Respondent Terrell Bell's right to renew his real estate salesperson license (number 57680-94) is REVOKED, effective on the date the Final Decision and Order is signed by the Board.

IT IS FURTHER ORDERED that the Respondent shall pay all recoverable costs in this matter in an amount to be established, pursuant to Wis. Admin. Code § SPS 2.18, prior to the Department's consideration of any such application.

Dated at Madison, Wisconsin on June 8, 2023.

STATE OF WISCONSIN  
DIVISION OF HEARINGS AND APPEALS  
4822 Madison Yards Way, 5<sup>th</sup> Floor North  
Madison, Wisconsin 53705-5400  
Tel. (414) 227-4025  
Fax: (608) 264-9885  
Email: [Angela.ChaputFoy@wisconsin.gov](mailto:Angela.ChaputFoy@wisconsin.gov)

By:   
Angela Chaput Foy  
Administrative Law Judge