

REAL ESTATE AGENCY
BEFORE THE REAL ESTATE COMMISSIONER

ANNA A KRASKOFF

FINAL ORDER BY DEFAULT

PROCEDURAL HISTORY

1.

1.1 On October 21, 2021, the Real Estate Commissioner issued, by certified mail, a *Notice of Intent to revoke* the real estate broker's license of Anna Kraskoff (Kraskoff). The Real Estate Agency (Agency) sent the *Notice of Intent* to Kraskoff's two last known addresses of record with the Agency (PO Box 567, Woodburn, OR 97071 and 8370 Redwood Ln NE, Woodburn, OR 97301). The *Notice of Intent* was also mailed to Kraskoff by regular first-class mail to both of the above addresses in a handwritten envelope. And the notice of intent was also emailed to Kraskoff' at her email address of record.

1.2 On October 27, 2021, the Agency received the certified return receipt from the October 21, 2021, mailing to 8370 Redwood Ln NE, Woodburn, OR 97301. The receipt showed a delivery date of October 25, 2021, and was signed by Kraskoff. The certified mailing to PO Box 567, Woodburn, OR 97071 was returned to the Agency as unclaimed, unable to forward, return to sender. The mailings in the handwritten envelopes were not returned to the Agency.

1.3 The email was not returned as undeliverable. And per DocuSign Certificate of Completion, the *Notice of Intent* document was viewed by Kraskoff at 1:58PM on October 28, 2021.

1.4 By email dated November 16, 2021, Kraskoff requested a hearing in this matter.

1.5 OREA file was forwarded to the Office of Administrative Hearings. A hearing date was set for December 13, 2022 through December 14, 2022 at 9:00 AM.

1 **FINDINGS OF FACT**

2 3.

3 3.1 At all times mentioned herein, Kraskoff was licensed as a real estate broker.
4 Kraskoff's license has been associated with several registered business names during the
5 events described below.

6 3.2 On January 3, 2017, the Agency received an inquiry from the Social Security
7 Administration Office of the Inspector General. An investigation was opened and assigned
8 case number 2017-5.

9 3.3 On June 30, 2020, the Agency received a complaint from Jeff Seeber against
10 Kraskoff. A separate investigation was opened in regard to this complaint and assigned case
11 number 2020-206.

12 **Facts Related to Case #2017-5 Investigation:**

13 3.4 On January 4, 2017, Vallerie Bush, with Regional Multiple Listing Service
14 (RMLS) confirmed Kraskoff had listings and closed transactions from 2014 to 2017. During this
15 period, Kraskoff's license had been affiliated with three registered business names (RBN):
16 Real Estate Auctions.com, Artisan Realty Group, and Premier Property Group.

17 3.5 Agency records show that RBN RealEstate Auctions.com had been in void status
18 since November 16, 2016. Kraskoff had been a broker with this RBN from December 23, 2013
19 through August 12, 2014. In a phone interview on March 1, 2017, Kraskoff explained she
20 worked at RealEstateAuctions.com from approximately August 2014 to July 2015. Kraskoff
21 reported a total of 12 closed transactions during her time at RealEstate Auctions.com.

22 3.6 Kraskoff had been a broker with Artisan Realty LLC from August 12, 2014
23 through April 3, 2015. This RBN was closed effective February 28, 2017. In her interview
24 Kraskoff mentioned, regarding her switch from REalEstateAuctions.com to Artisan, that she
25 had short notice to move her license and it "was stressful because I had active transactions at
26 the time."

27 3.7 Kraskoff reported four of her transactions closed while working under Artisan
28 Realty.

29 3.8 Kraskoff's license was associated with Premier Property Group (PPG) effective
30 April 3, 2015. David Tangvald, Principal Broker PPG, provided Kraskoff's income data for

1 commissions earned while working under that RBN. Documents indicated that all income had
2 been reported under Kraskoff's social security number SSN1.

3 3.9 Documentation and reports provided from Kraskoff, escrow documents and PPG
4 displayed the following earnings for Kraskoff

- 5 • 2014 commissions estimated at \$73,523.00
- 6 • 2015 income reported to IRS as \$141,720.90
- 7 • 2016 income reported to IRS as \$165,818.77

8 3.10 Kraskoff was assigned two social security numbers (SSN1 and SSN2) by the
9 Social Security Administration (SSA) as a child. Her parents completed the applications for
10 these numbers using two variations of the family name: "Sharipoff" for SSN1 and "Sharipoff"
11 for SSN2.

12 3.11 As an adult, Kraskoff did not inform SSA that she had obtained and was actively
13 using two different social security numbers. She used both numbers for different purposes.
14 SSN1 was used on her employment documents for wage reporting to the IRS. SSN2 was used
15 to apply for and collect, benefits from various federal agencies.

16 3.12 A lump sum payment of \$39,082 had been reported to the IRS from Artisan
17 Realty Group during the 2014 tax year for SSN1. The payee was listed as Anna Kraskoff and
18 the payer was Artisan Realty Group of Sisters, Oregon.

19 3.13 When asked about her employment with Artisan, Kraskoff told the SSA, "I have
20 no idea who they are." Additionally, Kraskoff did not report her home to SSA which is an asset
21 in determining eligibility for SSA programs.

22 3.14 During a phone call on January 11, 2017, Clayton Teel, Investigator with Oregon
23 Department of Human Services, notified the Agency that the Kraskoff family was receiving
24 Medicaid benefits administered through the Oregon Health Plan. Benefits were awarded based
25 off of reported financial need. Regarding these benefits, on November 3, 2014, Kraskoff
26 submitted an application for Oregon Health Plan benefits based on reported family income of
27 less than \$3,211 per month.

28 3.15 In September 2016, Kraskoff submitted to DHS an application for Oregon Health
29 Plan benefits. The application contained the following:

- 30 • On page 2, Kraskoff reported her social security number as SSN2.

1 • On page 11, Kraskoff reported her husband Evan Kraskoff as the income source in
2 their household.

3 • Page 12 provided an area to report other income. Kraskoff wrote "N/A."

4 • Page 13 gave the opportunity to report income from other members of the household.
5 Kraskoff wrote "N/A."

6 • Page 20 Kraskoff signed, under penalty of perjury that she provided true answers to all
7 questions and dated the form September 12, 2016.

8 3.16 On January 3, 2018, Kraskoff was indicted on three counts of Theft of
9 Government Funds.

10 3.17 Special Assistant U.S. Attorney, Rachel Sowray (Sowray) was assigned to
11 prosecute Kraskoff's case. Sowray informed the Agency of additional loss to the Department of
12 Education occurring in 2016, when Kraskoff applied for PELL Grant funding for her son. If
13 Kraskoff had reported her income, the educational funds would not have been disbursed.

14 3.18 In February 2018, Sowray provided a summary of the losses the federal
15 agencies sustained as discovered at that time:

16 • Loss to Social Security Administration -\$19,496.50

17 • Loss to Department of Health and Human Services -\$47,605.85

18 • Loss to the U.S. Department of Education -\$5,000.00 (The final judgment ordered
19 restitution of\$16,637.00)

20 3.19 In June 2018, Kraskoff was charged by Superseding Indictment with four counts
21 of Theft of Government funds.

22 3.20 On October 16, 2020, a signed plea agreement was filed with the United States
23 District Court, District of Oregon. In the plea agreement, Kraskoff pled guilty to Count 2 and the
24 government dismissed the remaining counts at sentencing.

25 3.21 On April 13, 2021, the sentencing hearing was held and Kraskoff was convicted
26 of Count 2 of Theft of Government Funds (18 U.S.C § 641). That same day, the Judgment was
27 signed by the judge in the U.S District Court of Oregon. Kraskoff was sentenced to a fine with
28 supervised probation for a term of three years. Restitution was ordered as follows:

29 • \$47,605.85 to DHS

30 • \$19,496.50 to SSA

1 • \$16,637.00 to DOE.

2 Kraskoff did not report this judgment to the Agency.

3 **Facts Related to 2020-206 Investigation**

4 3.22 Complainant Jeff Seeber (Seeber) was the owner of 7515 SW Mapleleaf in
5 Portland (Mapleleaf).

6 3.23 Kraskoff's license was associated with Premiere Property Group (PPG) from
7 November 3, 2015 until July 9, 2020. Her license was moved to EXP Realty, LLC where it
8 remained until October 1, 2021, when her license expired for failure to renew during the month
9 of September 2021. Kraskoff renewed her license late on October 1, 2021, and as of October
10 11, 2021, her license was not associated with a registered business name.

11 3.24 Per the Oregon Secretary of State records, Kraskoff was listed as the registered
12 agent, organizer and sole member of Sun West Designs, LLC (Sun West).

13 3.25 In June 2020, Seeber decided to sell Mapleleaf. Beth Fernandez (Fernandez) of
14 PPG represented Seeber in the sale. It was suggested to do an exclusive listing due to
15 Mapleleaf's condition and Seebers were not ready to list on RMLS.

16 3.26 Initially, Mapleleaf was marketed within the PPG office for \$290,000, but the
17 price was lowered to \$225,000. On June 17, 2020, the same day the price was lowered,
18 Kraskoff submitted a full price all cash offer on behalf of Sun West Designs LLC and/Assigns.
19 According to Fernandez, Kraskoff presented the offer as if she was representing another party.

20 3.27 On June 26, 2020, Fernandez texted Kraskoff to inquire about the earnest
21 money. Fernandez said it was Kraskoff's text response that made her realize Kraskoff was the
22 buyer. Fernandez stated, "That was the first I knew she was actually the buyer. She didn't
23 disclose it anywhere."

24 3.28 The Seebers were upset once they learned that Kraskoff was the buyer. Agency
25 staff interviewed Seeber and asked if he heard or saw any communication that Kraskoff was a
26 principal to the Mapleleaf transaction. Seeber said, "We were totally unaware."

27 3.29 Fernandez texted Kraskoff suggesting she disclose in writing she was a
28 principal. When agency staff interviewed Kraskoff, she stated she did disclose being a
29 principal, and said her disclosure was in conversation with Fernandez and later by text.
30

1 3.30 On June 19, 2020, Kraskoff texted Fernandez, writing the buyer was a local
2 family who just closed on a sale and were looking to reinvest in a buy and hold rental.

3 3.31 Fernandez stated Kraskoff never said she was the buyer. According to
4 Fernandez, it wasn't until after the offer was submitted that Kraskoff claimed she was the
5 buyer.

6 3.32 During her interview, Kraskoff maintained she was not the initial buyer for
7 Mapleleaf, but that she had an out of state partner investor named Justin.

8 3.33 In her written response to the Agency, Kraskoff did not mention a partner
9 investor. She also failed to disclose that she stepped in as the buyer. Kraskoff wrote in part,
10 "Our full intention was to purchase this property, working with the sellers on their move out
11 timelines. At the end the decision was made that this project was just not for us, there are too
12 many unknowns..."

13 3.34 On June 22, 2020, earnest money was due to be deposited by 5pm per the
14 purchase and sale agreement. No earnest money was deposited on that date.

15 3.35 On June 26, 2020, six days after it was due, Kraskoff deposited the earnest
16 money with escrow.

17 3.36 On June 23, 2020, Kraskoff created a posting on Craigslist.com under the real
18 estate by owner category, offering Mapleleaf for sale.

19 3.37 The Agency issued a Subpoena to Craigslist requesting a full copy of the
20 advertisement and posting record. The phone number and email address shown on the
21 posting record for the Craigslist add match the phone number and email address Kraskoff
22 entered on her license record with the Agency.

23 3.38 When asked during her interview if she knew anything about the Craigslist ad for
24 Mapleleaf, Kraskoff said, "No I don't. I had nothing to do with any of that."

25 3.39 After the offer to purchase, Kraskoff had many long appointments to view
26 Mapleleaf, allegedly to bring contractors by the house. There were multiple appointments for
27 several hours.

28 3.40 Seeber witnessed several well dressed people being brought by the house on
29 two different occasions and there was no indication any of them were contractors. There was
30 no logo or business marking on the vehicles indicating it was related to any business.

1 an act of fraud and dishonest conduct in violation of ORS 696.301(14) (2013 edition).
2 Kraskoff's conduct was substantially related to her fitness to conduct professional real
3 estate activity because she knowingly concealed earnings from professional real estate
4 activity and personal assets, and because she made false statements regarding her
5 own professional real estate business.

- 6 3. By failing to report her earnings from professional real estate activity to the SSA and by
7 falsely attesting on applications for SSA benefits a that the information on her
8 applications was accurate, Kraskoff fraudulently received \$47,505.85 in benefits.
9 Kraskoff's conduct constitutes an act of fraud and dishonest conduct in violation of
10 696.301(14) (2013 and 2015 Edition). Kraskoff's conduct was substantially related to
11 her fitness to conduct professional real estate activity because she knowingly concealed
12 her earnings from professional real estate activity and made false statements on
13 applications for SSA benefits regarding her real estate earnings.
- 14 4. By failing to report her earnings from professional real estate activity to the U.S.
15 Department of Education, Kraskoff fraudulently received \$16,367.00 in Pell grants.
16 Kraskoff's conduct constitutes an act of fraud and dishonest conduct in violation of
17 696.301(14) (2013 and 2015 Edition). Kraskoff's conduct was substantially related to
18 her fitness to conduct professional real estate activity because she knowingly concealed
19 her earnings from professional real estate activity and made false statements on
20 applications for SSA benefits regarding her real estate earnings.
- 21 5. By failing to report her conviction of Theft of Government Funds (18 U.S.C §641) within
22 twenty calendar days, Kraskoff violated ORS 696.301(3) as it incorporates OAR 863-
23 015-0175(1)(a),(b),(c), and OAR 863-015-0175(4); (1-1-21 Edition).
- 24 6. By failing to disclose being a Principal in the transaction on the June 17, 2020, offer to
25 purchase the Mapleleaf property, Kraskoff acted as an agent and undisclosed principal
26 in violation of ORS 696.301(5),(12),(14) and (15) (2019 Editions). Additionally, Kraskoff
27 violated ORS 696.301(3) as it incorporates ORS 696.810(2)(a) (2019 Edition) and OAR
28 863-015-0145(1) (1-1-20 Edition).
- 29 7. Kraskoff communicated to the listing agent on the Mapleleaf transaction that the buyer
30 was a local family. In a written statement to the Agency Kraskoff stated her full intention

1 was to purchase Mapleleaf, yet in a later interview she reported to the Agency the buyer
2 was an individual from another state. By making multiple representations regarding her
3 involvement on the Mapleleaf transaction, Kraskoff violated ORS 696.301(12),(14), and
4 (15) (2019 Editions). She also violated ORS 696.301(3) as it incorporates
5 696.810(2)(a)(c) (2019 Edition). Licensee's statements were made in the course of
6 professional real estate activity and demonstrated dishonest conduct and bad faith in
7 dealing with agents and other principals in the transaction.

8 8. By depositing the earnest money on the Mapleleaf transaction six days after it was due,
9 Kraskoff violated ORS 696.301(12),(14), and(15) (2019 Editions). Kraskoff also violated
10 ORS 696.301(3) as it incorporates 696.810(2)(a) (2019 Edition). Licensee's conduct
11 demonstrated untrustworthiness and lack of good faith in dealing with agents and other
12 principals in the transaction.

13 9. By listing the Mapleleaf property on Craigslist.com and offering it for sale, Kraskoff
14 violated 696.301(1),(4),(6),(12),(14), and (15) (2019 Edition). Kraskoff also violated ORS
15 696.301(3) as it incorporates OAR 863-015-0125(2)(a),(b) (1-1-20 Edition). Kraskoff's
16 conduct created a reasonable probability of damage or injury to a potential buyer
17 because at the time of the Craigslist listing Kraskoff was not the legal owner and did not
18 have a right to transfer title to the property.

19 10. By asking the Seebers to vacate the property so she could get repair bids, but using
20 that time to show the property to prospective buyers, Kraskoff violated ORS
21 696.301(12),(14),(15) (2019 Editions) and ORS 696.301(3) as it incorporates
22 696.810(2)(a)(c) (2019 Edition). Kraskoff's conduct demonstrated dishonesty,
23 untrustworthiness and lack of good faith in dealing with agents and principals in a real
24 estate transaction.

25 11. The material facts established that Kraskoff's conduct resulted in significant damage
26 and injury to multiple agencies that provided benefits to Kraskoff when she
27 misrepresented her earnings in order to obtain those benefits. Kraskoff's conduct in
28 connection with the facts above demonstrated incompetence in the performance of
29 professional real estate activity and dishonestly and fraudulent conduct. Revocation of
30

1 Kraskoff's real estate license is an appropriate sanction under ORS 696.396(2)(c)(A),
2 (B) and (C).

3 12. Licensee is in default for failure to appear at the hearing as scheduled.
4

5 **ORDER**

6 Based on the foregoing, IT IS HEREBY ORDERED that Kraskoff's broker license is
7 revoked. Revocation of Kraskoff's license is appropriate even if one or more of the violations
8 above are reversed or remanded on appeal.
9

10 Dated this 20th day of March, 2023.

11 *OREGON REAL ESTATE AGENCY*

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13 

14
15 DocuSigned by:
Steven Strode
16 _____
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17 STEVEN STRODE
18 Real Estate Commissioner
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20 _____
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22 NOTICE OF RIGHT TO APPEAL: You are entitled to judicial review of this Order. Judicial
23 review may be obtained by filing a petition for review within 60 days from the date of service of
24 this order. Judicial review is to the Oregon Court of Appeals, pursuant to the provisions of
25 ORS 183.482.
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