

NEW JERSEY REAL ESTATE COMMISSION

NEW JERSEY REAL ESTATE COMMISSION	)	DOCKET NUMBER REC-E-26-010
	)	
Complainant	)	ORDER TO SHOW CAUSE
	)	(REC Ref. No.10015641)
vs.	)	
	)	
PAULA S. WIRTH, licensed New Jersey	)	
real estate salesperson, (9799460)	)	
	)	
	)	
Respondents.	)	

THIS MATTER being commenced by the New Jersey Real Estate Commission (the “Commission”) in the Department of Banking and Insurance, State of New Jersey, on its own motion, pursuant to the provisions of the New Jersey Real Estate Broker and Salesperson Act, N.J.S.A. 45:15-1 to -42, and the regulations promulgated thereunder at N.J.A.C. 11:5-1.1 to -12.18, and it appearing that:

1. Respondent, Paula S. Wirth (“Wirth”) is a licensed New Jersey real estate salesperson, currently licensed with Exp Realty, LLC, a licensed New Jersey real estate broker, whose main office is located at 28 Valley Road, #1, Montclair, New Jersey. Wirth was licensed with Comprehensive Realty Co., Inc. d/b/a Re/Max Tri County from March 4, 1997 through October 5, 2021; and

2. At all relevant times, Wirth represented Susan M. Wirth, her sister in the sale of the property located at 85 Marshall Avenue, Hamilton, New Jersey, which contained two units; and

3. Closing for the above property occurred on January 3, 2022 and there was no certificate of occupancy issued for the first floor unit; and

4. Wirth then forwarded an altered certificate of occupancy that was issued in 2018, which made it appear to be from the second floor unit where it was from the first floor; and

5. On or about June 29, 2022, Wirth was charged with uttering a writing knowing that it contains a false statement, in violation of NJSA 2C:21-4A, a crime of the 4th degree; and

6. On April 7, 2023, Wirth submitted her renewal application for the 2023-2025 license term. She answered “no” to question 1, which asks “With the exception of motor vehicle violations, since your last New Jersey Real Estate license was issued or renewed, have you or any business in which you were an owner, partner, officer or director, or member or manager of a limited liability company, been charged, indicted, convicted or pleaded “nolo contendere” to any offense, crime or misdemeanor in the state of New Jersey, any other state or by the federal government.” Her license was issued for the 2023-2025 license term; and

7. On April 19, 2024, Wirth pled guilty to disturbing the peace, Hamilton Township ordinance §345-6 and was fined \$391.40. She has paid the fine in full; and

8. On August 5, 2022, Wirth provided a written statement to the Real Estate Commission investigator assigned to this matter. In the statement, she admitted to forging the certificate of occupancy. She indicated that she looked through her files and could not find the certificate of occupancy which she was sure was obtained. She said that, “I found a coupon for the unit for a c of o inspection...Finding the coupon was further confirmation that the c of o was misplaced....I added the name of the tenant and unit information based upon the fact that I was certain that I had the c of o but simply had misplaced it;” and

9. Respondent Wirth's conduct is in violation of N.J.S.A. 45:15-17(a) substantial misrepresentation, in that creating a falsified certificate of occupancy, an official government document, and submitting same to be used in the transaction concerning the property constitutes a substantial misrepresentation; and

10. Respondent Wirth's conduct is in violation of N.J.S.A. 45:15-17(e), dishonesty, bad faith and unworthiness, in that creating a falsified certificate of occupancy, and submitting same to Hamilton Township constitutes dishonesty, bad faith and dishonest dealing; and

11. Respondent Wirth's conduct is in violation of N.J.S.A. 45:15-17(n), in that by answering "no" to question number one of the license renewal questionnaire, she procured a license by fraud, misrepresentation or deceit; and

12. Respondent Wirth's conduct is in violation of N.J.S.A. 45:15-17(l) in that creating a falsified certificate of occupancy, and submitting same to Hamilton Township constitutes fraudulent conduct and dishonest dealing; and

And for good cause shown,

IT IS ON THIS 12th DAY OF August, 2026

ORDERED that Respondent, Paula S. Wirth shall show cause why her real estate salesperson's license should not be suspended or revoked and/or why fines or other sanctions should not be imposed pursuant to N.J.S.A. 45:15-17 and N.J.A.C. 11:5-1.1. Respondent, Wirth, shall file a written Answer to the charges in this Order to Show Cause as required by N.J.A.C. 11:5-11.2 within twenty (20) days of the service of this Order. As required by N.J.A.C. 11:5-11.2,

Respondent's written Answer must include specific admissions or denials of all allegations in the Order to Show Cause, state the factual basis of each and every factual allegation denied and assert any defenses that Respondent intends to present if this matter is deemed a contested case and a plenary hearing is held; and

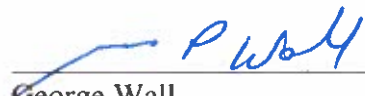
IT IS FURTHER ORDERED that failure to comply with all the requirements of N.J.A.C. 11:5-11.2 may result in a determination that there are no material facts or issues of law in dispute and any presentation made to the Commission will be limited to the issue of the severity of any sanction or penalty to be imposed; and

IT IS FURTHER ORDERED that the New Jersey Real Estate Commission will review this Order to Show Cause and Answer filed, if any, at a meeting scheduled on or after the 6th day of October, 2026 at 9:30 a.m. to determine whether there is a material fact or issue of law contested. No appearance is required at that time; and

IT IS FURTHER ORDERED that if the Commission determines that there is a material fact or issue of law contested, a hearing will be scheduled for a future date; and

IT IS FURTHER ORDERED that if the Commission determines that there is no material fact or issue of law contested, a hearing shall be scheduled at which the Respondent will be limited to presenting witnesses and documentary evidence regarding the issue of the severity of any sanction or penalty to be imposed; and

IT IS FURTHER ORDERED that a copy of this Order be served upon the Respondent as provided in N.J.S.A. 45:15-18, which service may be accomplished by serving a copy of this Order on the Respondent personally, or by delivering a copy hereof to her last known business addresses via certified mail.



George Wall
Acting Executive Director
New Jersey Real Estate Commission

MD/Wirth OTSC/REC Enforcement