



CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

New Jersey Office of the Attorney General

Division of Consumer Affairs
New Jersey State Board of Architects
124 Halsey Street, 3rd Floor, Newark, NJ 07102



JOHN J. HOFFMAN
Acting Attorney General

STEVE C. LEE
Acting Director

Mailing Address:
P.O. Box 45001
Newark, NJ 07101
(973) 504-6385

CERTIFIED TRUE COPY

May 18, 2015

By Certified and Regular Mail

Kostantinos Aravantinos
Kon/Struction, LLC
337 State Highway 36
Port Monmouth, NJ 07758



RE: I/M/O Kostantinos Aravantinos, Unlicensed
Complaint No.102358

Offer of Settlement In Lieu of Filing a Formal Complaint

Dear Mr. Aravantinos:

This letter is to advise you that the New Jersey State Board of Architects (hereinafter the "Board") has had an opportunity to review allegations that although you are not a New Jersey licensed architect, you and/or your firm, Kon/Struction, LLC (hereafter collectively "you") have utilized the term "architect", or its substantial equivalent, and offered to provide and/or provided architectural services, in violation of N.J.S.A. 45:3-10 and N.J.A.C. 13:27-3.3.

More specifically, evidence and testimony reveal that you utilize the term "architect", "architectural" and/or its substantial equivalent in your agreements to provide services as a home improvement contractor and, further, offer to provide and provide architectural design drawings/plans prepared by you with your title block on them, all of which constitute the unlicensed practice of architecture. Accordingly, upon review of all available information, the Board has preliminarily found that probable cause exists to support a finding that you are in violation of N.J.S.A. 45:3-10 and N.J.A.C. 13:27-3.3.

As a result of the foregoing, the Board has preliminarily determined that the above violations are sufficient to warrant the initiation of formal proceedings against you. Notwithstanding that decision, the Board has determined that it will first offer you an opportunity to settle this matter in an attempt to avoid the initiation of more formal proceedings if you consent to the following terms:

1. Upon your signing of the acknowledgment at the bottom of this letter, you agree to immediately **CEASE AND DESIST** from engaging in the unlicensed practice of architecture, including, but not limited to: utilizing the term "architect", "architectural", or its substantial equivalent; offering and/or providing architectural services, including preparation of architectural design drawings/plans and placing your title block on those drawings/plans; conveying the impression that you are a New Jersey licensed architect; and advertising, offering or performing design services that involve the preparation of construction documents, including, but not limited to, those that consist of drawings or specifications necessary to support an application for building or other construction permits.

2. Payment of a civil penalty in the amount of **\$10,000.00** in connection with the above violations, the first instalment of \$2,500.00 to be paid immediately, \$2,500.00 to be paid on or before July 1, 2015, \$2,500.00 to be paid on or before August 1, 2015 and \$2,500.00 to be paid on or before September 1, 2015. You agree that in the event you fail to make any required monthly installment, then the full amount shall become immediately due and owing and a Certificate of Debt shall be issued for the remaining balance. Payment shall be made by certified check, bank check or money order payable to the "State of New Jersey" and forwarded to the State Board of Architects, 124 Halsey Street, 3rd Floor, Newark, New Jersey 07102.

In making a determination, you should know that pursuant to N.J.S.A. 45:1-25 any person who engages in conduct which is in violation of any provision of the statutes and regulations administered by the Board shall, in addition to any other sanctions provided by statute, be liable for a civil penalty of not more than \$10,000.00 for the first violation and not more than \$20,000.00 for the second and each subsequent violation. However, in an effort to resolve this matter amicably, the Board offers to settle on the terms stated above. If you are willing to resolve this matter on the offered settlement terms, you may do so by signing the acknowledgment at the bottom of this letter and returning it to the Board office within 15 days. In such event, this letter shall be a matter of public record.

In the event you are unwilling to settle this matter on the offered terms, it will be referred to the Attorney General's office for the initiation of a formal proceeding. In such event, you will be afforded an opportunity to defend against the alleged violations. You are advised, however, that in the event formal charges are filed, the Board may assess civil penalties in an amount greater than that herein offered in settlement should any charges against you be sustained. Additionally, the Board may, if the facts herein or any additional facts are found to so warrant, request that an order be entered requiring you to reimburse certain monies and/or requiring you to pay costs incurred by the Board.

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Should you have any questions concerning this letter or the settlement offer herein, I suggest that you contact Deputy Attorney General Michelle Albertson, who may be reached at (973) 648-7297.

If you elect to settle this matter, you should sign the acknowledgment at the bottom of this letter and return it to the Board within fifteen (15) days following your receipt of this letter. In the event that the Board receives no response from you within fifteen (15) days, the Board's settlement offer shall be considered withdrawn and the matter will be referred to the Attorney General's Office for the initiation of a formal proceeding.

NEW JERSEY STATE BOARD OF ARCHITECTS

By: _____

CHARLES KIRK

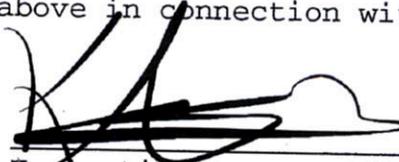
Acting Executive Director

cc: B. Michelle Albertson,
Deputy Attorney General

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ACKNOWLEDGMENT: I, Kostantinos Aravantinos, hereby acknowledge that I have read and reviewed the settlement proposal set forth in the above letter. I acknowledge the conduct which has been charged. I am aware that, by signing this acknowledgment, I am waiving any rights I may have to defend myself against any charges of wrongdoing at an administrative hearing. I am also aware that the action taken against me by the Board herein is a matter of public record and that this letter is a public document. I hereby agree to immediately cease and desist from engaging in the unlicensed practice of architecture as outlined herein above. I further agree to the payment of a \$10,000.00 civil penalty as set forth herein above in connection with the above violations.



Kostantinos Aravantinos,
Individually and for
Kon/Struction, LLC

Dated: June 4, 2015