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FILED

APR 25 2023

DEPARTMENT OF REAL ESTATE

By B. Nicholas

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BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of

MARK STEVEN KOUMELIS,

Respondent.

No. H-7213 SAC

ACCUSATION

The Complainant, TRICIA D. PARKHURST, in her official capacity as a
Supervising Special Investigator of the Department of Real Estate ("Department") of the State of
California, brings this Accusation against Respondent MARK STEVEN KOUMELIS
("Respondent"), and is informed and alleges as follows:

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Respondent is presently licensed and/or has license rights under the Real Estate
Law (Part 1 of Division 4 of the California Business and Professions Code) ("Code") as a real
estate salesperson, License ID 00833571.

Respondent was licensed by the Department as a real estate salesperson on or
about March 15, 1982. Unless renewed Respondent's salesperson license expires on May 22,
2026.

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On or about November 5, 2020, in the Superior Court of the State of California, County of Placer, Case No. 62-169705, Respondent was convicted of a violation of Section 20002(a) (hit and run property damage) of the California Vehicle Code, a crime which bears a substantial relationship under Section 2910, Title 10, Chapter 6, of the California Code of Regulations (“Regulations”) to the qualifications, functions or duties of a real estate licensee.

GROUNDS FOR DISCIPLINE

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The facts identified in paragraph 2, constitutes cause under Sections 490 and 10177(b) of the Code, for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

COST RECOVERY

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Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, 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 licenses and license rights of Respondent under the Code, for the cost of

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1 investigation and enforcement as permitted by law, and for such other and further relief as may
2 be proper under the provisions of law.

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5 TRICIA D. PARKHURST
6 Supervising Special Investigator

7 Dated at Sacramento, California,
8 this 10th day of April, 2023
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21 DISCOVERY DEMAND
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23 Pursuant to Sections 11507.6, *et seq.* of the *Government Code*, the Department of
24 Real Estate hereby makes demand for discovery pursuant to the guidelines set forth in the
25 *Administrative Procedure Act*. Failure to provide Discovery to the Department of Real Estate
26 may result in the exclusion of witnesses and documents at the hearing or other sanctions that the
27 Office of Administrative Hearings deems appropriate.