

FILED

NOV 05 2020

DEPARTMENT OF REAL ESTATE
By

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of:) DRE No. H-12439 SF
)
) **PACIFIC PARK REALTY INC**)
) and KEITH KURTIS PAPULIAS,)
)
) Respondents.)

ORDER ACCEPTING VOLUNTARY SURRENDER OF REAL ESTATE LICENSE

On May 04, 2020, an Accusation was filed in this matter against Respondents
PACIFIC PARK REALTY INC and KEITH KURTIS PAPULIAS ("Respondents").

On August 18, 2020, Respondent **PACIFIC PARK REALTY INC** petitioned the
Commissioner to voluntarily surrender its real estate corporate broker license pursuant to Section
10100.2 of the Business and Professions Code.

IT IS HEREBY ORDERED that Respondent **PACIFIC PARK REALTY INC** 's
petition for voluntary surrender of its real estate corporate broker license is accepted as of the
effective date of this Order as set forth below, based upon the understanding and agreement
expressed in Respondent's Declaration dated August 18, 2020, (attached as Exhibit "A" hereto).
Respondent's license certificate and pocket card shall be sent to the below-listed address so that
they reach the Department of Real Estate on or before the effective date of this Order:

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DEPARTMENT OF REAL ESTATE
Attention: Licensing Flag Section
P. O. Box 137013
Sacramento, CA 95813-7013

This Order shall become effective at 12 o'clock noon on NOV 30 2020

DATED: 10-28-20

DOUGLAS R. McCAULEY
REAL ESTATE COMMISSIONER

Douglas R. McCauley

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8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA
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11 * * *

12 In the Matter of the Accusation of)

13 PACIFIC PARK REALTY INC and)
14 KEITH KURTIS PAPULIAS,)

Respondents.)

No. H-12439 SF

15 DECLARATION

16 PACIFIC PARK REALTY INC (PPRI) is currently licensed and/or has license
17 rights as a corporate real estate broker. At all times herein mentioned, PPRI was and is acting by
18 and through KEITH KURTIS PAPULIAS (PAPULIAS), who is the designated broker/officer.

19 In lieu of proceeding in this matter in accordance with the provisions of the
20 Administrative Procedure Act (Sections 11400 et seq., of the Government Code), PPRI wishes to
21 voluntarily surrender its real estate license issued by the Department of Real Estate (Department),
22 pursuant to Business and Professions Code Section 10100.2.

23 PPRI and PAPULIAS understands that by so voluntarily surrendering PPRI's real
24 estate license, PPRI may be relicensed as a corporate real estate broker, only by petitioning for
25 reinstatement pursuant to Section 11522 of the Government Code. PPRI and PAPULIAS
26 understands that by so voluntarily surrendering PPRI's real estate license, PPRI and PAPULIAS
27 agree to the following:

1 1. The filing of this Declaration shall be deemed as PPRI's petition for
2 voluntary surrender.

3 2. It shall also be deemed to be an understanding and agreement by PPRI that
4 they waive all rights to require the Commissioner to prove the allegations contained in the
5 Accusation filed in this matter at a hearing held in accordance with the provisions of the
6 Administrative Procedure Act (Government Code Sections 11400 et seq.), and that PPRI also
7 waive other rights afforded to them in connection with the hearing such as the right to discovery.
8 the right to present evidence in defense of the allegations in the Accusation and the right to cross-
9 examine witnesses.

10 3. PPRI further agree that upon acceptance by the Commissioner, as evidenced
11 by an appropriate order, all affidavits and all relevant evidence obtained by the Department in this
12 matter prior to the Commissioner's acceptance, and all allegations contained in the Accusation filed
13 in the Department Case No. H-12439 SF, may be considered by the Department to be true and
14 correct for the purpose of deciding whether to grant relicensure or reinstatement pursuant to
15 Government Code Section 11522.

16 4. PPRI further understands and agrees that upon acceptance by the
17 Commissioner, as evidenced by an appropriate order, of their petition to voluntarily surrender all of
18 their licenses and license rights under the Real Estate Law, the Department will take no further
19 disciplinary action related to the Accusation filed in Department Case No. H-12439 SF, with the
20 exception of the use of such affidavits, evidence, and allegations as outlined above in Paragraph 3.

21 5. PPRI freely and voluntarily surrenders all licenses and license rights under
22 the Real Estate Law.

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I declare under penalty of perjury under the laws of the State of California that the
above is true and correct and that this declaration was executed August 18, 2020. at
Mill Valley, California.



PACIFIC PARK REALTY INC
Respondent

By: KEITH KURTIS PAPULIAS
Designated Officer