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**FILED**  
JAN 13 2025  
DEPARTMENT OF REAL ESTATE  
By J. Taggart

8  
9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 \* \* \*

12 In the Matter of the Accusation of )

13 KARUN PAUL GILL, )

14 Respondent. )

No. H-12756 SF

ACCUSATION

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16 The Complainant, STEPHANIE YEE, acting in her official capacity as a  
17 Supervising Special Investigator of the State of California, for cause of Accusation against  
18 KARUN PAUL GILL (Respondent), is informed and alleges as follows:

19 1

20 At all times herein mentioned, Respondent was and is presently licensed and/or  
21 has license rights under Real Estate Law, Part 1 of Division 4 of the California Business and  
22 Professions Code (the Code) by the Department of Real Estate (the Department) as a real estate  
23 salesperson. Effective July 20, 2024, Respondent's real estate salesperson license expired.  
24 Pursuant to Section 10201 of the Code, Respondent retains renewal rights for 2 years. Pursuant  
25 to Section 10103 of the Code, the Department retains jurisdiction.

26 2

27 On or about October 26, 2023, in the Superior Court of California, County of

1 Santa Clara, Case No. C2209232, Respondent was convicted of violating Section 422 (a)  
2 (Threats to Commit a Crime Resulting in Death or Great Bodily Injury) of the California Penal  
3 Code, a misdemeanor and crime which bears a substantial relationship under Section 2910, Title  
4 10, Chapter 6, California Code of Regulations (Regulations), to the qualifications, functions or  
5 duties of a real estate licensee.

6 3

7 A diligent search was made of the records of the Department, relating to  
8 Respondent's real estate salesperson license No. 02113234. As a result of said search, no  
9 written record was discovered of Respondent notifying the Department of any conviction.

10 4

11 The facts alleged above, in Paragraph 2, constitute grounds under Sections 490  
12 (Conviction of Crime) and 10177 (b) (Conviction of Crime) of the Code for suspension or  
13 revocation of all licenses and license rights of Respondent under the Real Estate Law.

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15 The facts alleged above, in Paragraph 3, constitute a violation of Section 10186.2  
16 (a)(1)(B) and Section 10186.2 (a)(2) (Failure to Report in Writing of Conviction within 30  
17 Days) of the Code, and are grounds for the suspension or revocation of all licenses and license  
18 rights of Respondent under Sections 10186.2 (b) and 10177(d) (Willful Disregard of Real Estate  
19 Laws) of the Code.

20 COST RECOVERY

21 6

22 Section 10106 of the Code provides, in pertinent part, that in any order issued  
23 in resolution of a disciplinary proceeding before the Department, the Commissioner may request  
24 the Administrative Law Judge to direct a licensee found to have committed a violation of this  
25 part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the  
26 case.

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1                   WHEREFORE, Complainant prays that a hearing be conducted on the allegations  
2 of this Accusation and that upon proof thereof, a decision be rendered revoking all licenses and  
3 license rights of Respondent under the Real Estate Law, for the cost of investigation and  
4 enforcement as permitted by law, and for such other and further relief as may be proper under  
5 other provisions of law.

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9                   STEPHANIE YEE  
10                  Supervising Special Investigator

11  
12 Dated at Oakland, California, on  
13 this 7th day of January, 2025.

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15  
16                                   DISCOVERY DEMAND

17                   Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the  
18 Department hereby makes demand for discovery pursuant to the guidelines set forth in the  
19 *Administrative Procedure Act*. Failure to provide Discovery to the Department may result in the  
20 exclusion of witnesses and documents at the hearing or other sanctions that the Office of  
21 Administrative Hearings deems appropriate.