

1 3. Respondent filed a Notice of Defense pursuant to Section 11505 of the
2 Government Code for the purpose of requesting a hearing on the allegations in the
3 Accusation. Respondent hereby freely and voluntarily withdraws said Notice of Defense.
4 Respondent acknowledges that Respondent will thereby waive Respondent's right to require
5 the Real Estate Commissioner (Commissioner) to prove the allegations in the Accusation at a
6 contested hearing held in accordance with the provisions of the APA and that Respondent
7 will waive other rights afforded to Respondent in connection with the hearing such as the
8 right to present evidence in defense of the allegations in the Accusation and the right to
9 cross-examine witnesses.

10 4. This Order is based on the factual allegations contained in the
11 Accusation. In the interest of expediency and economy, Respondent chooses not to contest these
12 factual allegations, but to remain silent and understand that, as a result thereof, these factual
13 statements will serve as a prima facie basis for the "Determination of Issues" and "Order" set
14 forth below. The Commissioner shall not be required to provide further evidence to prove such
15 allegations.

16 5. It is understood by the parties that the Commissioner may adopt the
17 Stipulation and Agreement as her Decision and Order in this matter thereby imposing the
18 penalty and sanctions on Respondent's real estate license and license rights as set forth in the
19 below "Order." In the event that the Commissioner in her discretion does not adopt the
20 Stipulation and Agreement, it shall be void and of no effect, and Respondent shall retain the
21 right to a hearing and proceeding on the Accusation under all the provisions of the APA and
22 shall not be bound by any admission or waiver made herein.

23 6. This Decision and Order or any subsequent Order of the Commissioner
24 made pursuant to this Stipulation and Agreement shall not constitute an estoppel, merger or
25 bar to any further administrative or civil proceedings by the Department with respect to any
26 matters which were not specifically alleged to be causes for accusation in this proceeding.

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1 the Subdivided Lands Law, Regulations of the Real Estate Commissioner or conditions
2 attaching to the restricted license.

3 3. Respondent shall not be eligible to apply for the issuance of an
4 unrestricted real estate license nor for removal of any of the conditions, limitations or
5 restrictions of a restricted license until two (2) years have elapsed from the effective date of
6 this Decision and Order.

7 4. Respondent shall submit with any application for license under an
8 employing broker, or any application for transfer to a new employing broker, a statement signed
9 by the prospective employing real estate broker on a form approved by the Department which
10 shall certify:

11 (a) That the employing broker has read the Decision and Order of the
12 Commissioner which granted the right to a restricted license; and

13 (b) That the employing broker will exercise close supervision over the
14 performance by the restricted licensee relating to activities for which
15 a real estate license is required.

16 5. Respondent shall, within nine (9) months from the effective date of this
17 Decision and Order, present evidence satisfactory to the Commissioner that Respondent has,
18 since the most recent issuance of an original or renewal real estate license, taken and
19 successfully completed the continuing education requirements of Article 2.5 of Chapter 3 of
20 the Real Estate Law for renewal of a real estate license. If Respondent fails to satisfy this
21 condition, Respondent's real estate license shall automatically be suspended until
22 Respondent presents evidence satisfactory to the Commissioner of having taken and
23 successfully completed the continuing education requirement.

24 6. Respondent shall notify the Commissioner in writing within seventy-two
25 (72) hours of any arrest by sending a certified letter to the Commissioner at the Department of
26 Real Estate, 651 Bannon Street, Suite 504, Sacramento, CA 95811. The letter shall set forth the
27 date of Respondent's arrest, the crime for which Respondent was arrested and the name and

1 address of the arresting law enforcement agency. Respondent's failure to timely file written
2 notice shall constitute an independent violation of the terms of the restricted license and shall be
3 grounds for the suspension or revocation of that license.

4 7. Respondent shall pay \$1,744.50 to the Department for the costs of
5 investigation and enforcement of this matter. Respondent's failure to pay the Department shall
6 constitute an independent violation of the terms of the restricted license and shall be grounds for
7 the immediate suspension or revocation of that license. Said payment shall be in the form of a
8 cashier's check or certified check made payable to the Real Estate Fund. Said check must be
9 received by the Department prior to the effective date of the order in this matter at the following
10 address: Department of Real Estate, 651 Bannon Street, Suite 504, Sacramento, CA 95811.

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12 10/10/2025
13 _____
14 DATED

Megan Lee Olsen

MEGAN LEE OLSEN, Counsel
DEPARTMENT OF REAL ESTATE

15 * * *

16 I have read the Stipulation and Agreement, discussed it with my counsel, and
17 its terms are understood by me and are agreeable and acceptable to me. I understand that I
18 am waiving rights given to me by the APA (including but not limited to Sections 11506,
19 11508, 11509, and 11513 of the Government Code), and I willingly, intelligently, and
20 voluntarily waive those rights, including the right of requiring the Commissioner to prove
21 the allegations in the Accusation at a hearing at which I would have the right to cross-
22 examine witnesses against me and to present evidence in defense and mitigation of the
23 charges.

24 Respondent and Respondent's attorney further agree to send the original signed
25 Stipulation by mail to the following address no later than one (1) week from the date the
26 Stipulation is signed by Respondent and Respondent's attorney: *Department of Real Estate,*
27 *Legal Section, 651 Bannon Street, Suite 507, Sacramento, CA 95811.* Respondent and

1 Respondent's attorney understand and agree that if they fail to return the original signed
2 Stipulation by the due date, Complainant retains the right to set this matter for hearing.

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4 10/9/2025

DocuSigned by:
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D8926839756041A...

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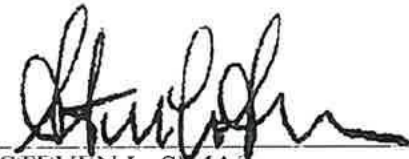
KARUN PAUL GILL
Respondent

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* * *

8 *I have reviewed the Stipulation and Agreement as to form and content and have advised my*
9 *client accordingly.*

10
11 10/9/2025



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STEVEN L. SIMAS
Attorney for Respondent

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The foregoing Stipulation and Agreement is hereby adopted by the Real Estate
Commissioner as his Decision and Order and shall become effective at 12 o'clock noon on
FEB 02 2026

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IT IS SO ORDERED 11/25/2025

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CHIKA SUNQUIST
REAL ESTATE COMMISSIONER



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By: Marcus L. McCarther
Chief Deputy Real Estate Commissioner

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