

FILED

NOV 25 2014

REAL ESTATE COMMISSION
Robert A. [Signature]

BEFORE THE REAL ESTATE COMMISSION
STATE OF NEVADA

JOSEPH R. DECKER, Administrator,
REAL ESTATE DIVISION, DEPARTMENT
OF BUSINESS & INDUSTRY,
STATE OF NEVADA,

Case No. RES 14-02-148-619

Petitioner,

vs.

COMPLAINT AND NOTICE OF HEARING

RONALD C. FILIPOVIC,

Respondent.

The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY OF THE STATE OF NEVADA ("DIVISION"), by and through its counsel, Catherine Cortez Masto, Attorney General of the State of Nevada, and Kimberly A. Arguello, Senior Deputy Attorney General, hereby notifies RESPONDENT RONALD FILIPOVIC ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL ESTATE COMMISSION ("COMMISSION") which hearing will be held pursuant to Chapters 233B and Chapter 645 of the Nevada Revised Statutes ("NRS") and Chapter 645 of the Nevada Administrative Code ("NAC"). The purpose of the hearing is to consider the allegations stated below and to determine if the RESPONDENT should be subject to an administrative penalty as set forth in NRS 645.633 and/or NRS 645.630 and/or NRS 622.400, and the discipline to be imposed, if violations of law are proven.

JURISDICTION

RESPONDENT was at all relevant times mentioned in this Complaint licensed as a Salesperson by the Division under license number S.0166878 and is therefore subject to the jurisdiction of the Division and the provisions of NRS chapter 645 and NAC chapter 645.

FACTUAL ALLEGATIONS

1. RESPONDENT, at the relevant times mentioned in this Complaint, was licensed as a Salesperson by the Division under license number S.0166878 and is currently inactive

1 and subject to the jurisdiction of the Division and the provisions of NRS chapter 645 and NAC
2 chapter 645.

3 2. On October 3, 2013, RESPONDENT pleaded guilty to one count of conspiracy
4 to Commit Bank, Mail and Wire Fraud.

5 3. This felony stems directly from acts done in his capacity as a licensed real
6 estate salesperson.

7 4. RESPONDENT admits in his Plea Agreement that he and his coconspirators
8 used straw buyers to buy homes using false loan applications and supporting documents in
9 order to obtain large portions of the loan proceeds for themselves.

10 5. RESPONDENT will be imprisoned for a total term of 41 months.

11 6. RESPONDENT and his coconspirators are jointly and severally liable for
12 restitution to numerous banks in the amount of \$28,281,381.00.

13 **VIOLATIONS**

14 RESPONDENT has committed the following violations of law:

15 7. RESPONDENT violated NRS 645.633(1)(d)(1) by being convicted of two
16 felonies relating to the practice of the licensee.

17 8. RESPONDENT violated NRS 645.633(1)(d)(2) by being convicted of two crimes
18 involving fraud, deceit, misrepresentation or moral turpitude.

19 **DISCIPLINE AUTHORIZED**

20 9. Pursuant to NRS 645.630 and NRS 645.633, the Commission is empowered to
21 impose an administrative fine of up to \$10,000 per violation against RESPONDENT and
22 further to suspend, revoke or place conditions on the license of RESPONDENT.

23 10. Additionally, under NRS Chapter 622, the Commission is authorized to impose
24 costs of the proceeding upon Respondent, including investigative costs and attorney's fees, if
25 the Commission otherwise imposes discipline on Respondent.

26 11. Therefore, the Division requests that the Commission take such disciplinary
27 action as it deems appropriate under the circumstances.

Attorney General's Office
555 E. Washington, Suite 3900
Las Vegas, NV 89101

NOTICE OF HEARING

1
2 PLEASE TAKE NOTICE, that a disciplinary hearing has been set to consider the
3 Administrative Complaint against the above-named Respondent in accordance with Chapters
4 233B and 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada Administrative
5 Code.

6 THE HEARING WILL TAKE PLACE on January 7, 2015 commencing at 9:00 a.m.,
7 or as soon thereafter as the Commission is able to hear the matter, and each day
8 thereafter commencing at 9:00 a.m. through January 9, 2015, or earlier if the business
9 of the Commission is concluded. The Commission meeting will be held on January 7,
10 2015, at the Henderson City Hall, Council Chambers Conference Room, 240 Water
11 Street, Henderson, Nevada 89015. The meeting will continue on January 8, 2015, at the
12 Henderson City Hall, Council Chambers Conference Room, 240 Water Street,
13 Henderson, Nevada 89015, commencing at 9:00 a.m., and on January 9, 2015, should
14 business not be concluded, starting at 9:00 a.m. at the Bradley Building, 2501 East
15 Sahara Avenue, 2nd Floor Conference Room, Las Vegas, Nevada 89104.

16 STACKED CALENDAR: Your hearing is one of several hearings scheduled at the
17 same time as part of a regular meeting of the Commission that is expected to last from
18 January 7 through January 9, 2015, or earlier if the business of the Commission is
19 concluded. Thus, your hearing may be continued until later in the day or from day to
20 day. It is your responsibility to be present when your case is called. If you are not
21 present when your hearing is called, a default may be entered against you and the
22 Commission may decide the case as if all allegations in the complaint were true. If you
23 have any questions please call Rebecca Hardin, Commission Coordinator (702) 486-
24 4074.

25 YOUR RIGHTS AT THE HEARING: except as mentioned below, the hearing is an
26 open meeting under Nevada's open meeting law, and may be attended by the public. After
27 the evidence and arguments, the commission may conduct a closed meeting to discuss your
28 alleged misconduct or professional competence. A verbatim record will be made by a certified

1 court reporter. You are entitled to a copy of the transcript of the open and closed portions of
2 the meeting, although you must pay for the transcription.

3 As the Respondent, you are specifically informed that you have the right to appear and
4 be heard in your defense, either personally or through your counsel of choice. At the hearing,
5 the Division has the burden of proving the allegations in the complaint and will call witnesses
6 and present evidence against you. You have the right to respond and to present relevant
7 evidence and argument on all issues involved. You have the right to call and examine
8 witnesses, introduce exhibits, and cross-examine opposing witnesses on any matter relevant
9 to the issues involved.

10 You have the right to request that the Commission issue subpoenas to compel
11 witnesses to testify and/or evidence to be offered on your behalf. In making the request, you
12 may be required to demonstrate the relevance of the witness' testimony and/or evidence.
13 Other important rights you have are listed in NRS 645.680 through 645.990, NRS Chapter
14 233B, and NAC 645.810 through 645.875.

15 ...
16 ...
17 ...
18 ...
19 ...
20 ...
21 ...
22 ...
23 ...
24 ...
25 ...
26 ...
27 ...
28 ...

1 The purpose of the hearing is to determine if the Respondent has violated NRS 645
2 and/or NAC 645 and if the allegations contained herein are substantially proven by the
3 evidence presented and to further determine what administrative penalty is to be assessed
4 against the RESPONDENT, if any, pursuant to NRS 645.235, 645.633 and or 645.630.

5 DATED this 26th day of November, 2014.

6 State of Nevada
7 Department of Business and Industry
8 Real Estate Division

9 By: 
10 JOSEPH R. DECKER, Administrator
11 2501 East Sahara Avenue
12 Las Vegas, Nevada 89104-4137
13 (702) 486-4033

14 CATHERINE CORTEZ MASTO
15 Attorney General

16 By: 
17 KIMBERLY A. ARGUELLO
18 Senior Deputy Attorney General
19 555 East Washington Ave., Ste. 3900
20 Las Vegas, Nevada 89101
21 (702) 486-3094
22 Attorneys for Real Estate Division
23
24
25
26
27
28