

FILED

AUG 11 2015

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

REAL ESTATE COMMISSION  
BY *Robert Aesch*

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

Case No. 2015-1391

Petitioner,

vs.

COMPLAINT AND NOTICE OF HEARING

SUSANNE BAEHR,

Respondent.

The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY OF THE STATE OF NEVADA ("DIVISION"), by and through its counsel, Adam Paul Laxalt, Attorney General of the State of Nevada, and Kimberly A. Arguello, Senior Deputy Attorney General, hereby notifies RESPONDENT SUSANNE BAEHR ("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 SUSANNE BAEHR was at all relevant times mentioned in this Complaint licensed as a salesperson by the Division under license number S.0168549 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.0168549 and is currently involuntary

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

3 2. On or about September 30, 2014 Respondent's salesperson license expired  
4 non-renewed.

5 3. On or about May 8, 2015, Respondent submitted Application for Reinstatement  
6 to the Division with certificates purportedly verifying twelve hours of continuing education from  
7 Key Realty School.

8 4. The continuing education certificates submitted to the Division were forged by  
9 Respondent.

10 5. Key Realty School confirmed that the certificates were not Key Realty School  
11 certificates and the course titles/numbers are not valid.

12 6. The Application for Reinstatement was purportedly signed by the Broker at  
13 Internet Realty, Randall S. van Reken.

14 7. Respondent forged the signature of Randall S. van Reken.

15 8. Mr. van Reken confirmed that the signature on the Application for Reinstatement  
16 was forged.

17 9. On May 15, 2015, the Division sent Respondent a letter requesting an affidavit  
18 response to the allegations of forgery. A second request was sent to Respondent on June 2,  
19 2015.

20 10. To date, no response has been received by the Division from Respondent.

### 21 VIOLATIONS

22 RESPONDENT has committed the following violations of law:

23 11. RESPONDENT violated NRS 645.633 (1)(i) for conduct which constitutes  
24 deceitful, fraudulent or dishonest dealing by forging continuing education certificates and  
25 submitting them to the Division

26 12. RESPONDENT violated NRS 645.633 (1)(i) for conduct which constitutes  
27 deceitful, fraudulent or dishonest dealing by forging a brokers signature on the Application for  
28 Reinstatement and submitting it to the Division.



1           **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at the  
2 same time as part of a regular meeting of the Commission that is expected to last from  
3 September 15 through September 17, 2015, or earlier if the business of the Commission  
4 is concluded. Thus, your hearing may be continued until later in the day or from day to  
5 day. It is your responsibility to be present when your case is called. If you are not  
6 present when your hearing is called, a default may be entered against you and the  
7 Commission may decide the case as if all allegations in the complaint were true. If you  
8 have any questions please call Rebecca Hardin, Commission Coordinator (702) 486-  
9 4074.

10           **YOUR RIGHTS AT THE HEARING:** except as mentioned below, the hearing is an  
11 open meeting under Nevada's open meeting law, and may be attended by the public. After  
12 the evidence and arguments, the commission may conduct a closed meeting to discuss your  
13 alleged misconduct or professional competence. A verbatim record will be made by a certified  
14 court reporter. You are entitled to a copy of the transcript of the open and closed portions of  
15 the meeting, although you must pay for the transcription.

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

23           You have the right to request that the Commission issue subpoenas to compel  
24 witnesses to testify and/or evidence to be offered on your behalf. In making the request, you  
25 may be required to demonstrate the relevance of the witness' testimony and/or evidence.  
26 Other important rights you have are listed in NRS 645.680 through 645.990, NRS Chapter  
27 233B, and NAC 645.810 through 645.875.

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 11 day of AUGUST, 2015.

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 ADAM PAUL LAXALT  
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