

FILED

MAR 20 2015

BEFORE THE REAL ESTATE COMMISSION

REAL ESTATE COMMISSION
BY *[Signature]*

STATE OF NEVADA

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

Case No. 2014-4381

Petitioner,

vs.

COMPLAINT AND NOTICE OF HEARING

BRADLEY LAWSON,

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 BRADLEY LAWSON ("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 BRADLEY LAWSON was at all relevant times mentioned in this Complaint licensed as a Broker and Property Manager by the Division under license number B.1001386.LLC and PM.0165669.BKR and is therefore subject to the jurisdiction of the Division and the provisions of NRS chapter 645 and NAC chapter 645.

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

1 **FACTUAL ALLEGATIONS**

2 1. RESPONDENT, at the relevant times mentioned in this Complaint, was licensed
3 as a Broker and Property Manager, license numbers B.1001386.LLC and PM.0165669.BKR
4 from May 22, 2014 to July 18, 2014 with Winners, LLC and from July 18, 2014 through
5 present at Lawson Real Estate & Investments, and is currently in an active status and subject
6 to the jurisdiction of the Division and the provisions of NRS chapter 645 and NAC chapter 645.

7 2. As part of Respondent's Original Licensing Application for a broker's license,
8 Respondent submitted an experience verification form purportedly signed by Marty Zabib and
9 one purportedly signed by Mark Caro.

10 3. In fact, neither Mr. Zabib nor Mr. Caro signed the experience verification forms.

11 4. Mr. Zabib reviewed the experience verification form and confirmed that he did
12 not sign the document. It was not his signature and it was notarized by a notary that he has
13 not used.

14 5. Mr. Caro reviewed the experience verification form and confirmed that he did not
15 sign the document. It was not his signature and it was purportedly notarized in Nevada. Mr.
16 Caro lives and works in Flagstaff Arizona.

17 6. Respondent submitted forged documents to the Division in order to obtain a
18 license.

19 **VIOLATIONS**

20 RESPONDENT has committed the following violations of law:

21 7. For submitting the documents with the forged signature of Marty Zabib,
22 RESPONDENT violated NRS 645.630(1)(a) by making a material misrepresentation and NRS
23 645.633(1)(i) as such conduct constitutes deceitful, fraudulent or dishonest dealing.

24 8. For submitting the documents with the forged signature of Marc Caro,
25 RESPONDENT violated NRS 645.630(1)(a) by making a material misrepresentation and NRS
26 645.633(1)(i) as such conduct constitutes deceitful, fraudulent or dishonest dealing.

27 **DISCIPLINE AUTHORIZED**

28 9. Pursuant to NRS 645.630 and NRS 645.633, the Commission is empowered to

1 impose an administrative fine of up to \$10,000 per violation against RESPONDENT and
2 further to suspend, revoke or place conditions on the license of RESPONDENT.

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

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

8 **NOTICE OF HEARING**

9 **PLEASE TAKE NOTICE**, that a disciplinary hearing has been set to consider the
10 Administrative Complaint against the above-named Respondent in accordance with Chapters
11 233B and 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada Administrative
12 Code.

13 **THE HEARING WILL TAKE PLACE on April 21, 2015 commencing at 9:00 a.m., or**
14 **as soon thereafter as the Commission is able to hear the matter, and each day**
15 **thereafter commencing at 9:00 a.m. through April 23, 2015, or earlier if the business of**
16 **the Commission is concluded. The Commission meeting will be held on April 21, 2015,**
17 **at the Grant Sawyer Building, Gaming Control Board, 555 East Washington Avenue,**
18 **Room 2450, Las Vegas, Nevada 89101. The meeting will continue on April 22, 2015, at**
19 **the Grant Sawyer Building, Gaming Control Board, 555 East Washington Avenue, Room**
20 **2450, Las Vegas, Nevada 89101, commencing at 9:00 a.m., and on April 23, 2015,**
21 **should business not be concluded, starting at 9:00 a.m. at the Bradley Building, 2501**
22 **East Sahara Avenue, 2nd Floor Conference Room, Las Vegas, Nevada 89104.**

23 **STACKED CALENDAR: Your hearing is one of several hearings scheduled at the**
24 **same time as part of a regular meeting of the Commission that is expected to last from**
25 **April 21 through April 23, 2015, or earlier if the business of the Commission is**
26 **concluded. Thus, your hearing may be continued until later in the day or from day to**
27 **day. It is your responsibility to be present when your case is called. If you are not**
28 **present when your hearing is called, a default may be entered against you and the**

1 Commission may decide the case as if all allegations in the complaint were true. If you
2 have any questions please call Rebecca Hardin, Commission Coordinator (702) 486-
3 4074.

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

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

17 You have the right to request that the Commission issue subpoenas to compel
18 witnesses to testify and/or evidence to be offered on your behalf. In making the request, you
19 may be required to demonstrate the relevance of the witness' testimony and/or evidence.
20 Other important rights you have are listed in NRS 645.680 through 645.990, NRS Chapter
21 233B, and NAC 645.810 through 645.875.

22 ///

23 ///

24 ///

25 ///

26 ///

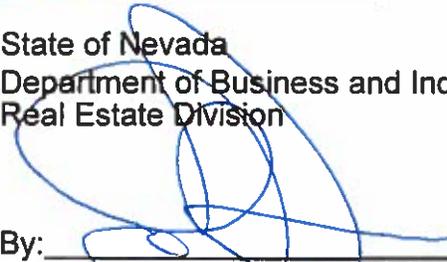
27 ///

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 20th day of MARCH, 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