

1 BEFORE THE REAL ESTATE COMMISSION

FILED

2 STATE OF NEVADA

OCT 27 2016

3 SHARATH CHANDRA, Administrator,
4 REAL ESTATE DIVISION, DEPARTMENT
5 OF BUSINESS & INDUSTRY,
6 STATE OF NEVADA,

Case No. RES 15-08-33-194

REAL ESTATE COMMISSION
BY *[Signature]*

7 Petitioner,

8 vs.

9 VICKIE VALDOV,

Respondent.

10 **COMPLAINT AND NOTICE OF HEARING**

11 The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY
12 OF THE STATE OF NEVADA ("Division"), by and through its counsel, Adam Paul Laxalt, Attorney
13 General of the State of Nevada, and Keith E. Kizer, Senior Deputy Attorney General, hereby notifies
14 RESPONDENT Vickie Valdov ("RESPONDENT") of an administrative hearing before the STATE OF
15 NEVADA REAL ESTATE COMMISSION ("Commission"), which will be held pursuant to Chapters
16 233B and Chapter 645 of the Nevada Revised Statutes ("NRS") and Chapter 645 of the Nevada
17 Administrative Code ("NAC"). The purpose of the hearing is to consider the allegations stated below
18 and to determine if the RESPONDENT should be subject to an administrative penalty as set forth in
19 NRS 645.633 and/or NRS 645.630 and/or NRS 622.400, and the discipline to be imposed, if violations
20 of law are proven.

21 **JURISDICTION**

22 RESPONDENT was at all relevant times mentioned in this Complaint licensed by the Division
23 as a Broker under license number B.0003475.CORP, and as a Property Manager under permit number
24 PM.0162739.BKR, and is therefore subject to the jurisdiction of the Division and the Commission and
25 the provisions of NRS Chapter 645 and NAC Chapter 645.

26 **FACTUAL ALLEGATIONS**

27 1. RESPONDENT is licensed as a Broker, license number B.0003475.CORP, and as a
28 Property Manager, permit number PM.0162739.BKR, and is currently in active status.

1 **DISCIPLINE AUTHORIZED**

2 12. Pursuant to NRS 645.660, the Commission is empowered to impose an administrative
3 fine of up to \$5,000 per violation against RESPONDENT and further to suspend, revoke or place
4 conditions on the license of RESPONDENT.

5 13. Pursuant to NRS 645.633, the Commission is empowered to impose an administrative
6 fine of up to \$10,000 per violation against RESPONDENT and further to suspend, revoke or place
7 conditions on the license of RESPONDENT.

8 14. Additionally, under NRS Chapter 622, the Commission is authorized to impose costs of
9 the proceeding upon RESPONDENT, including investigative costs and attorney's fees, if the
10 Commission otherwise imposes discipline on RESPONDENT.

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

13 **NOTICE OF HEARING**

14 **PLEASE TAKE NOTICE**, that a disciplinary hearing has been set to consider the
15 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B and
16 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada Administrative Code.

17 **THE HEARING WILL TAKE PLACE** on December 5, 2016 commencing at 1:00 p.m., or
18 as soon thereafter as the Commission is able to hear the matter, and each day thereafter
19 commencing at 9:00 a.m. through December 7, 2016, or earlier if the business of the Commission
20 is concluded. The Commission meeting will be held on December 5, 2016, at the Grant Sawyer
21 Building, Gaming Control Board, 555 East Washington Avenue, Room 2450, Las Vegas, Nevada
22 89101. The meeting will continue on December 6, 2016 at the Nevada Department of
23 Employment Training and Rehabilitation, 2800 East St. Louis Avenue, Conference Room A-C,
24 Las Vegas, NV 89104, commencing at 9:00 a.m., and on December 7, 2016, should business not be
25 concluded, starting at 9:00 a.m. at the Nevada Department of Employment Training and
26 Rehabilitation, 2800 East St. Louis Avenue, Conference Room A-C, Las Vegas, NV 89104.

27 **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at the same
28 time as part of a regular meeting of the Commission that is expected to last from December 5

1 through December 7, 2016, or earlier if the business of the Commission is concluded. Thus, your
2 hearing may be continued until later in the day or from day to day. It is your responsibility to be
3 present when your case is called. If you are not present when your hearing is called, a default
4 may be entered against you and the Commission may decide the case as if all allegations in the
5 complaint were true. If you have any questions please call Rebecca Hardin, Commission
6 Coordinator (702) 486-4074.

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

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

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


23 The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or
24 NAC 645 and if the allegations contained herein are substantially proven by the evidence

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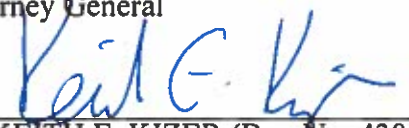
1 presented and to further determine what administrative penalty is to be assessed against the
2 RESPONDENT, if any, pursuant to NRS 645.235, 645.633 and or 645.630.

3 DATED this 27 day of October, 2016.

4 State of Nevada
5 Department of Business and Industry
6 Real Estate Division

7 By: 
8 SHARATH CHANDRA, Administrator
9 2501 East Sahara Avenue
10 Las Vegas, Nevada 89104-4137
11 (702) 486-4033

12 ADAM PAUL LAXALT
13 Attorney General

14 By: 
15 KEITH E. KIZER (Bar. No. 4305)
16 Senior Deputy Attorney General
17 555 East Washington Ave., Ste. 3900
18 Las Vegas, Nevada 89101
19 (702) 486-3326
20 Attorneys for Real Estate Division
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