

BEFORE THE REAL ESTATE COMMISSION

MAY 31 2016

STATE OF NEVADA

REAL ESTATE COMMISSION
BY *R. Laxalt*

1 JOSEPH R. DECKER, Administrator,
 2 REAL ESTATE DIVISION, DEPARTMENT
 3 OF BUSINESS & INDUSTRY,
 4 STATE OF NEVADA,
 5
 6 Petitioner,
 7 vs.
 8 ARTUR TERABELIAN,
 9 Respondent.

Case No. RES 13-08-20-054

COMPLAINT AND NOTICE OF HEARING

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

JURISDICTION

20
 21 RESPONDENT was at all relevant times mentioned in this Complaint licensed as a
 22 Broker Salesperson by the Division under license number BS.0060225, and is currently
 23 licensed as a Broker by the Division under license number BS.0060225.LLC since May 8,
 24 2012, and as a Property Manager under permit number PM.0165519.BKR since September
 25 21, 2012, and is therefore subject to the jurisdiction of the Division and the provisions of NRS
 26 chapter 645 and NAC chapter 645.

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

FACTUAL ALLEGATIONS

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2 1. RESPONDENT, at the relevant times mentioned in this Complaint, was licensed
3 as a Broker Salesperson by the Division under license number BS.0060225.

4 2. At all times relevant to this Complaint, RESPONDENT was associated with
5 broker Amir Feinsilber ("Feinsilber") at The Force Realty.

6 3. At all times relevant to this Complaint, RESPONDENT did not hold a property
7 management permit issued by the Division.

8 4. On or about March 28, 2005, Julie Klatt ("Klatt") became the owner of 5828
9 Michael Dean Street, North Las Vegas, Nevada ("Dean Street Property").

10 5. On or about February 28, 2011, RESPONDENT entered into a Property
11 Management Agreement for the Dean Street Property.

12 6. In that Property Management Agreement for the Dean Street Property,
13 RESPONDENT represented that he was a licensed broker.

14 7. RESPONDENT acted as the property manager of the Dean Street Property.

15 8. On the March 11, 2011 Residential Lease Agreement for the Dean Street
16 Property, RESPONDENT listed himself as the broker for Klatt.

17 9. The March 11, 2011 Residential Lease Agreement for the Dean Street Property
18 requires the tenant to make all payments payable to RESPONDENT.

19 10. RESPONDENT failed to remit, within a reasonable time, rent monies to his
20 broker which RESPONDENT received pursuant to that lease agreement.

21 11. On or about May 9, 2011, Klatt became the owner of 3318 North Decatur Blvd.,
22 Unit 1048, North Las Vegas, Nevada ("Decatur Property").

23 12. On or about June 1, 2011, RESPONDENT entered into a Property Management
24 Agreement for the Decatur Property.

25 13. RESPONDENT acted as the property manager of the Decatur Property.

26 14. RESPONDENT initialed the August 17, 2011 Residential Lease Agreement for
27 the Decatur Property indicating that he was the property landlord.

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1 at the Grant Sawyer Building, 555 East Washington Avenue, Room 4412, Las Vegas,
2 Nevada 89101. The meeting will continue on July 13, 2016 at the Grant Sawyer
3 Building, 555 East Washington Avenue, Room 4412, Las Vegas, Nevada 89101,
4 commencing at 9:00 a.m., and on July 14, 2016, should business not be concluded,
5 starting at 9:00 a.m. at the Grant Sawyer Building, 555 East Washington Avenue, Room
6 4412, Las Vegas, Nevada 89101.

7 **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at the
8 same time as part of a regular meeting of the Commission that is expected to last from
9 July 12 through July 14, 2016, or earlier if the business of the Commission is
10 concluded. Thus, your hearing may be continued until later in the day or from day to
11 day. It is your responsibility to be present when your case is called. If you are not
12 present when your hearing is called, a default may be entered against you and the
13 Commission may decide the case as if all allegations in the complaint were true. If you
14 have any questions please call Rebecca Hardin, Commission Coordinator (702) 486-
15 4074.

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

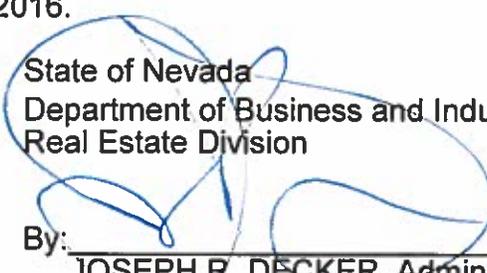
22 As the Respondent, you are specifically informed that you have the right to appear and
23 be heard in your defense, either personally or through your counsel of choice. At the hearing,
24 the Division has the burden of proving the allegations in the complaint and will call witnesses
25 and present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

1 You have the right to request that the Commission issue subpoenas to compel
2 witnesses to testify and/or evidence to be offered on your behalf. In making the request, you
3 may be required to demonstrate the relevance of the witness' testimony and/or evidence.
4 Other important rights you have are listed in NRS 645.680 through 645.990, NRS Chapter
5 233B, and NAC 645.810 through 645.875.

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

10 DATED this 25th day of May, 2016.

11 State of Nevada
12 Department of Business and Industry
13 Real Estate Division

14 By: 
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