

SHARATH CHANDRA, Administrator,
REAL ESTATE DIVISION, DEPARTMENT
OF BUSINESS & INDUSTRY,
STATE OF NEVADA,

Case Nos. 2017-1190 and 2017-1286

Petitioner,

vs.

KAREN C. XIAO,

Respondent.

COMPLAINT AND NOTICE OF HEARING

The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY OF THE STATE OF NEVADA ("Division") hereby notifies RESPONDENT KAREN C. XIAO ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL ESTATE COMMISSION ("Commission"). The 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 Broker under license numbers B.1000842.LLC and B.1001006.INDV, and permitted as a Property Manager under permit numbers PM.0163911.BKR and PM.0165379.BKR, and is therefore subject to the jurisdiction of the Division and the Commission, and the provisions of NRS chapter 645 and NAC chapter 645.

FACTUAL ALLEGATIONS

1. RESPONDENT has been licensed as a Broker under license number B.1000842.LLC, since June 30, 2011, which is currently in active status.

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

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

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


17 The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or
18 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 3rd day of August, 2018.

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

7 By: 
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