

BEFORE THE REAL ESTATE COMMISSION
STATE OF NEVADA

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

Petitioner,

vs.

KATHERINE HUNTER,

Respondent.

Case No. 2017-2158

FILED

FEB 19 2019

REAL ESTATE COMMISSION
Evelyn Patten

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 KATHERINE HUNTER, aka KATHERINE HUNTER-JONES ("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 Salesperson under license number S.0177706, 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 Salesperson under license number S.0177706 since September 3, 2015, and is currently on active status.

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2. At all times relevant to the Complaint, RESPONDENT was associated with broker Joanne McNulty ("McNulty") of RX Realty, B.0143526.LLC, or broker Antonio R. Sena ("Sena") of Shelter Realty Inc., B.0049099.LLC.

3. While associated with McNulty, RESPONDENT received \$1950 in funds from Norma Napier that she failed to turn over to McNulty or return to Ms. Napier on denial of McNulty's application for a rental.

4. RESPONDENT allowed Ms. Napier into rental property without the owner's consent.

5. While associated with Sena, RESPONDENT received \$500 in funds from client Patrick Johnson which she failed to turn over to Sena or return to Mr. Johnson on denial of his application.

VIOLATIONS

RESPONDENT has committed the following violations of law:

6. RESPONDENT violated NRS 645.254(7), NRS 654.630(1)(f) and (i), or NRS 654.633(1)(i) two times by failing to remit funds to her brokers.

7. RESPONDENT violated NRS 654.630(1)(f) and (i), or NRS 654.633(1)(i) two times by failing to give her clients their funds.

8. RESPONDENT violated NRS 645.252(2) when she allowed a client into a rental property without the owner's consent.

DISCIPLINE AUTHORIZED

9. Pursuant to NRS 645.630 and NRS 645.633, the Commission is empowered to impose an administrative fine of up to \$10,000 per violation against RESPONDENT and further to suspend, revoke or place conditions on the license of RESPONDENT.

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

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

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1 As the Respondent, you are specifically informed that you have the right to appear and be heard
2 in your defense, either personally or through your counsel of choice. At the hearing, the Division has
3 the burden of proving the allegations in the complaint and will call witnesses and present evidence
4 against you. You have the right to respond and to present relevant evidence and argument on all issues
5 involved.

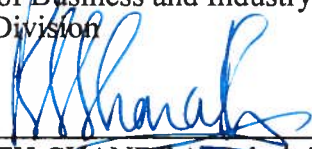
6 You have the right to call and examine witnesses, introduce exhibits, and cross-examine opposing
7 witnesses on any matter relevant to the issues involved.

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

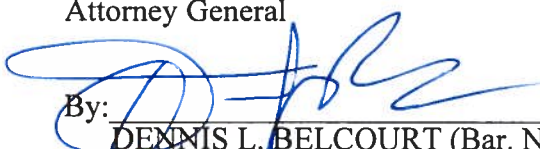
12 The purpose of the hearing is to determine if the Respondent has violated NRS 645 and NAC
13 645 and if the allegations contained herein are substantially proven by the evidence presented and
14 to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,
15 pursuant to NRS 645.235, 645.633 and 645.630.

16 DATED this 14 day of February, 2019.

17 State of Nevada
18 Department of Business and Industry
19 Real Estate Division

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