

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Petitioner,

vs.

RICH BARON,

Respondent.

Case No. 2017-1770

FILED

OCT 04 2019

REAL ESTATE COMMISSION  
BY *Emily Patten*

**COMPLAINT AND NOTICE OF HEARING**

The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY OF THE STATE OF NEVADA ("Division"), by and through its counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Dennis L. Belcourt, Deputy Attorney General, hereby notifies RESPONDENT RICH BARON ("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 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 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. At all relevant times mentioned in this Complaint, RESPONDENT held a broker's real estate license with the State of Nevada, license number B.1001166.INDV.

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1 2. RESPONDENT violated NRS 645.633(1)(h) by failing to maintain a current address of  
2 record with the Division.

3 3. RESPONDENT violated NRS 645.635 or NAC 645.605(11)(a) by failing to produce to the  
4 Division the transaction file on request of the Division.

5 **DISCIPLINE AUTHORIZED**

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

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

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

14 **NOTICE OF HEARING**

15 **PLEASE TAKE NOTICE**, that a disciplinary hearing has been set to consider the  
16 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B and  
17 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada Administrative Code.

18 **THE HEARING WILL TAKE PLACE on November 5, 2019 commencing at 9:00 a.m., or**  
19 **as soon thereafter as the Commission is able to hear the matter, and each day thereafter**  
20 **commencing at 9:00 a.m. through November 7, 2019 or earlier if the business of the Commission is**  
21 **concluded. The Commission meeting will be held on November 5, 2019, at the Nevada State**  
22 **Business Center, 3300 West Sahara Avenue, 4<sup>th</sup> Floor – Nevada Room, Las Vegas, Nevada 89102.**  
23 **The meeting will continue on November 6, 2019 at the Nevada State Business Center, 3300 West**  
24 **Sahara Avenue, 4<sup>th</sup> Floor – Nevada Room, Las Vegas, Nevada 89102, commencing at 9:00 a.m.,**  
25 **and on November 7, 2019, should business not be concluded, starting at 9:00 a.m. at the Nevada**  
26 **State Business Center, 3300 West Sahara Avenue, 4<sup>th</sup> Floor – Tahoe Room, Las Vegas, Nevada**  
27 **89102.**

28 ...

1           **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at the same  
2 time as part of a regular meeting of the Commission that is expected to last from November 5, 2019  
3 through November 7, 2019, or earlier if the business of the Commission is concluded. Thus, your  
4 hearing may be continued until later in the day or from day to day. It is your responsibility to be  
5 present when your case is called. If you are not present when your hearing is called, a default may  
6 be entered against you and the Commission may decide the case as if all allegations in the complaint  
7 were true. If you have any questions please call Evelyn Pattee, Commission Coordinator (702) 486-  
8 4074.

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

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


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

24           The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or NAC  
25 645 and if the allegations contained herein are substantially proven by the evidence presented and  
26 ...  
27 ...  
28 ...


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

3 DATED this 3 day of October, 2019.

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

7 By:   
8 SHARATH CHANDRA, Administrator  
9 3300 West Sahara Avenue, Suite 350  
10 Las Vegas, Nevada 89102

11 AARON D. FORD  
12 Attorney General

13 By:   
14 DENNIS E. BELCOURT (Bar. No. 2658)  
15 Deputy Attorney General  
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