

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Petitioner,

vs.

ANDREW ALBERTI, JR.,

Respondent.

Case No. 2017-776

**FILED**

OCT 04 2019

REAL ESTATE COMMISSION  
BY *Julie Tatter*

**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 ANDREW ALBERTI, JR. ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL ESTATE 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, NRS 645.630 and 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 by the Division as a broker under license number B.0032438.INDV, 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.0032438.INDV., since November 17, 1993, which license is currently expired.

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1 commencing at 9:00 a.m. through November 7, 2019 or earlier if the business of the Commission is  
2 concluded. The Commission meeting will be held on November 5, 2019, at the Nevada State  
3 Business Center, 3300 West Sahara Avenue, 4<sup>th</sup> Floor – Nevada Room, Las Vegas, Nevada 89102.  
4 The meeting will continue on November 6, 2019 at the Nevada State Business Center, 3300 West  
5 Sahara Avenue, 4<sup>th</sup> Floor – Nevada Room, Las Vegas, Nevada 89102, commencing at 9:00 a.m.,  
6 and on November 7, 2019, should business not be concluded, starting at 9:00 a.m. at the Nevada  
7 State Business Center, 3300 West Sahara Avenue, 4<sup>th</sup> Floor – Tahoe Room, Las Vegas, Nevada  
8 89102.

9 **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at the same  
10 time as part of a regular meeting of the Commission that is expected to last from November 5, 2019  
11 through November 7, 2019, or earlier if the business of the Commission is concluded. Thus, your  
12 hearing may be continued until later in the day or from day to day. It is your responsibility to be  
13 present when your case is called. If you are not present when your hearing is called, a default may  
14 be entered against you and the Commission may decide the case as if all allegations in the complaint  
15 were true. If you have any questions please call Evelyn Pattee, Commission Coordinator (702) 486-  
16 4074.

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

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

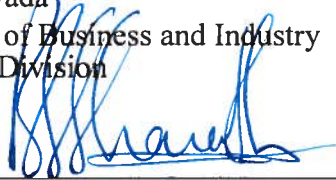
28 . . .

1 You have the right to request that the Commission issue subpoenas to compel witnesses to testify  
2 and/or evidence to be offered on your behalf. In making the request, you may be required to demonstrate  
3 the relevance of the witness' testimony and/or evidence. Other important rights you have are listed in  
4 NRS 645.680 through 645.990, NRS Chapter 233B, and NAC 645.810 through 645.920.


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

9 DATED this 3 day of October, 2019.

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

13 By:   
14 SHARATH CHANDRA, Administrator  
15 3300 West Sahara Avenue, Suite 350  
16 Las Vegas, Nevada 89102

17 AARON D. FORD  
18 Attorney General

19 By:   
20 DENNIS E. BELCOURT (Bar. No. 2658)  
21 Deputy Attorney General  
22 555 E. Washington Avenue, Suite 3900  
23 Las Vegas, Nevada 89101  
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25 Attorneys for Real Estate Division  
26  
27  
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