

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Petitioner,

vs.

MARY KATHLEEN KROL,

Respondent.

Case No. 2018-909

FILED

MAY 15 2020

REAL ESTATE COMMISSION

BY *Evelyn 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 MARY KATHLEEN KROL (“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 645.230, NRS 645.235, NRS 645.630, NRS 645.633 and NRS 622.400, and the discipline to be imposed, if violations of law are proven.

JURISDICTION

RESPONDENT at all relevant times mentioned in this Complaint conducted activities for which a license or permit is required by NRS Chapter 645 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 is a licensed salesperson under NRS Chapter 645, license S.0056651.LLC, but she does not hold a property management permit. Her broker at the time of the violations alleged herein was Nationwide Realty, LLC, Cynthia D. Lujan, license B.0010125.LLC.

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 June 16, 2020,
3 through June 18, 2020, 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
6 may be entered against you and the Commission may decide the case as if all allegations in the
7 complaint were true. If you have any questions please call Evelyn Pattee, Commission
8 Coordinator (702) 486-4074.

9 **YOUR RIGHTS AT THE HEARING:** except as mentioned below, the hearing is an open
10 meeting under Nevada’s open meeting law, and may be attended by the public. After the evidence and
11 arguments, the commission may conduct a closed meeting to discuss your alleged misconduct
12 or professional competence. You are entitled to a copy of the transcript of the open and closed
13 portions of the meeting, 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
16 the burden of proving the allegations in the complaint and will call witnesses and present evidence
17 against you. You have the right to respond and to present relevant evidence and argument on all issues
18 involved.

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

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

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

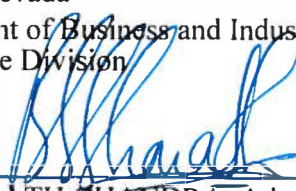
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1 determine what administrative penalty, if any, is to be assessed against the Respondent, pursuant to
2 NRS 645.235, NRS 645.230, NRS 633.630 or NRS 633.633.

3 DATED this 12 day of May, 2020.

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

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

11 AARON D. FORD
12 Attorney General

13 By: /s/ Dennis L. Belcourt
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