

FILED

APR 20 2017

REAL ESTATE COMMISSION
BY *[Signature]*

BEFORE THE REAL ESTATE COMMISSION
STATE OF NEVADA

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

Case No. 2015-2144

Petitioner,

vs.

ALISHA MORGAN,

Respondent.

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, Adam Paul Laxalt, Attorney General of the State of Nevada, and Keith E. Kizer, Senior Deputy Attorney General, hereby notifies RESPONDENT ALISHA MORGAN ("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 645.235 and/or NRS 622.400, and the discipline to be imposed, if violations of law are proven.

JURISDICTION

RESPONDENT engaged in activities which require a license as a real estate broker, real estate broker-salesperson, or real estate salesperson, and a permit to engage in property management, issued by the Division and is, therefore, subject to the jurisdiction of the Division and the Commission, and the provisions of NRS and NAC 645.

FACTUAL ALLEGATIONS

1. RESPONDENT has never obtained from the Division a real estate license or a permit to engage in property management.


1 against you. You have the right to respond and to present relevant evidence and argument on all issues
2 involved. You have the right to call and examine witnesses, introduce exhibits, and cross-examine
3 opposing witnesses on any matter relevant to the issues involved.

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


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

12 DATED this 19 day of April, 2017.

13 State of Nevada
14 Department of Business and Industry
15 Real Estate Division

16 By: 
17 SHARATH CHANDRA, Administrator
18 2501 East Sahara Avenue
19 Las Vegas, Nevada 89104-4137
20 (702) 486-4033

21 ADAM PAUL LAXALT
22 Attorney General

23 By: 
24 KEITH E. KIZER (Bar. No. 4305)
25 Senior Deputy Attorney General
26 555 East Washington Ave., Ste. 3900
27 Las Vegas, Nevada 89101
28 (702) 486-3326
Attorneys for Real Estate Division