

**FILED**

**JUL 03 2017**

**REAL ESTATE COMMISSION**  
*[Signature]*

BEFORE THE REAL ESTATE COMMISSION  
STATE OF NEVADA

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

Case No. 2016-3145

Petitioner,

vs.

PING YIU TO,

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 PING YIU TO ("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 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 by the Division as a Salesperson under license number S.0171994, 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 by the Division under license number S.0171994 since July 18, 2012, and the license is currently in active status.

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

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

6 **NOTICE OF HEARING**

7 **PLEASE TAKE NOTICE** that a disciplinary hearing has been set to consider the  
8 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B and  
9 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada Administrative Code.

10 **THE HEARING WILL TAKE PLACE** on August 15, 2017 commencing at 9:00 a.m., or  
11 as soon thereafter as the Commission is able to hear the matter, and each day thereafter  
12 commencing at 9:00 a.m. through August 17, 2017, or earlier if the business of the Commission is  
13 concluded. The Commission meeting will be held on August 15, 2017, at the Grant Sawyer  
14 Building, 555 East Washington Avenue, Room 4401, Las Vegas, Nevada 89101. The meeting will  
15 continue on August 16, 2017 at the Grant Sawyer Building, 555 East Washington Avenue, Room  
16 4401, Las Vegas, Nevada 89101 commencing at 9:00 a.m., and on August 17, 2017, should  
17 business not be concluded, starting at 9:00 a.m. at the Grant Sawyer Building, 555 East  
18 Washington Avenue, Room 4401, Las Vegas, Nevada 89101.

19 **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at the same  
20 time as part of a regular meeting of the Commission that is expected to last from August 15  
21 through August 17, 2017, or earlier if the business of the Commission is concluded. Thus, your  
22 hearing may be continued until later in the day or from day to day. It is your responsibility to be  
23 present when your case is called. If you are not present when your hearing is called, a default  
24 may be entered against you and the Commission may decide the case as if all allegations in the  
25 complaint were true. If you have any questions please call Rebecca Hardin, Commission  
26 Coordinator (702) 486-4074.

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1           YOUR RIGHTS AT THE HEARING: except as mentioned below, the hearing is an open  
2 meeting under Nevada's open meeting law, and may be attended by the public. After the evidence and  
3 arguments, the commission may conduct a closed meeting to discuss your alleged misconduct or  
4 professional competence. A verbatim record will be made by a certified court reporter. You are  
5 entitled to a copy of the transcript of the open and closed portions of the meeting, although you must  
6 pay for the transcription.

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

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

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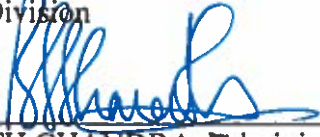
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1 The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or NAC  
2 645 and if the allegations contained herein are substantially proven by the evidence presented and to  
3 further determine what administrative penalty is to be assessed against the Respondent, if any, pursuant  
4 to NRS 645.633 and/or NRS 645.630.

5 DATED this 3<sup>RD</sup> day of July, 2017.

6 State of Nevada  
7 Department of Business and Industry  
8 Real Estate Division

9 By:   
10 SHARATH CHANDRA, Administrator  
11 2501 East Sahara Avenue  
12 Las Vegas, Nevada 89104-4137  
13 (702) 486-4033

14 ADAM PAUL LAXALT  
15 Attorney General

16 By:   
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21 (702) 486-3326  
22 Attorneys for Real Estate Division  
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