

FILED

APR 18 2017

REAL ESTATE COMMISSION
BY *Robert A. ...*

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Case No. 2016-1775

Petitioner,

vs.

BETH S. GARDNER,

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 BETH S. GARDNER ("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 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.0051771.LLC, 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.0051771.LLC since March 19, 2002, and is currently in active status.

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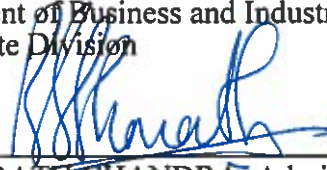
1 against you. You have the right to respond and to present relevant evidence and argument on all issues
2 involved. You have the right to call and examine witnesses, introduce exhibits, and cross-examine
3 opposing witnesses on any matter relevant to the issues involved.

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

12 DATED this 17 day of April, 2017.

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

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