

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Petitioner,

vs.

CYNTHIA L. GLICKMAN,

Respondent.

Case No. 2019-508

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 Robert Werbicky, Deputy Attorney General, hereby notifies RESPONDENT CYNTHIA L. GLICKMAN ("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 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, license number B.0007614.CORP, operating under the name Windermere Excellence since January 15, 2014.

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2. On or about September 10, 2019, the Administrator of the Real Estate Division issued RESPONDENT a Notice of Violation with the Imposition of Administrative Fine in the amount of \$3,000.00 for three separate violations of NRS 645.633(1)(i) by engaging in conduct which constitutes deceitful, fraudulent, or dishonest dealing.

3. The Notice of Violation with Imposition of Administrative Fine was properly served upon
RESPONDENT.

4. The Notice of Violation and accompanying letter from the Division advised that the fine must be remitted to the Division by October 10, 2019.

5. The Notice of Violation and accompanying letter contained notice to RESPONDENT advising RESPONDENT of her appeal rights if she disagreed with the finding of violation and/or imposition of the fine.

6. RESPONDENT did not appeal and did not request a hearing prior to October 10, 2019.

7. To date, RESPONDENT has failed to pay the administrative fine.

VIOLATION

RESPONDENT has committed the following violation of law:

8. RESPONDENT violated NRS 645.647(2), by failing to pay money which she owes to the Commission or the Division.

DISCIPLINE AUTHORIZED

9. Pursuant to NRS 645.630 and NRS 645.633, the Commission is empowered to impose an administrative fine of up to \$10,000 per violation against RESPONDENT and further to suspend, revoke or place conditions on the license of RESPONDENT.

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

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

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THE HEARING WILL TAKE PLACE on June 16, 2020 commencing at 9:00 a.m., or as soon thereafter as the Commission is able to hear the matter, and each day thereafter commencing at 9:00 a.m. through June 18, 2020, or earlier if the business of the Commission is concluded. The Commission meeting will be held on June 16, 2020, at the Nevada State Business Center, 3300 West Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102. The meeting will continue on June 17, 2020, at the Nevada State Business Center, 3300 West Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102, commencing at 9:00 a.m., and on June 18, 2020, should business not be concluded, starting at 9:00 a.m. at the Nevada State Business Center, 3300 West Sahara Avenue, 4th Floor – Tahoe Room, Las Vegas, Nevada 89102.

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

Page 3 of 4

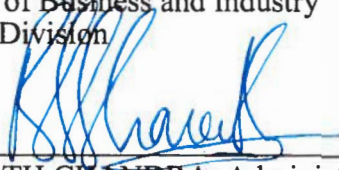
1 burden of proving the allegations in the complaint and will call witnesses and present evidence against
2 you. You have the right to respond and to present relevant evidence and argument on all issues involved.
3 You have the right to call and examine witnesses, introduce exhibits, and cross-examine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

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

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

13 DATED this 13 day of May, 2020.

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

17 By: 
18 SHARATH CHANDRA, Administrator
19 3300 West Sahara Avenue, Suite 350
20 Las Vegas, Nevada 89102

21 AARON D. FORD
22 Attorney General

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