

1 BEFORE THE REAL ESTATE COMMISSION

2 STATE OF NEVADA

3 SHARATH CHANDRA, Administrator,  
4 REAL ESTATE DIVISION, DEPARTMENT  
5 OF BUSINESS & INDUSTRY,  
6 STATE OF NEVADA,

Case No. 2018-1087

**FILED**

MAY 15 2020

REAL ESTATE COMMISSION

BY *Evelyn Tatter*

Petitioner,

7 vs.

8 HILLARY BROWN,

9 Respondent.

10 **COMPLAINT AND NOTICE OF HEARING**

11 The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY  
12 OF THE STATE OF NEVADA (“Division”) hereby notifies RESPONDENT HILLARY BROWN  
13 (“RESPONDENT”) of an administrative hearing before the STATE OF NEVADA REAL ESTATE  
14 COMMISSION (“Commission”). The hearing will be held pursuant to Chapters 233B and Chapter 645  
15 of the Nevada Revised Statutes (“NRS”) and Chapter 645 of the Nevada Administrative Code  
16 (“NAC”). The purpose of the hearing is to consider the allegations stated below and to determine if  
17 RESPONDENT should be subject to an administrative penalty as set forth in NRS 645.235 and NRS  
18 622.400, and the discipline to be imposed, if a violation of law is proven.

19 **JURISDICTION**

20 In conducting activities alleged herein, by bringing together sellers and buyers of real estate,  
21 RESPONDENT engaged in activities which require a license as a real estate broker, real estate broker-  
22 salesperson, or real estate salesperson, issued by the Division and is, therefore, subject to the  
23 jurisdiction of the Division and the Commission, and the provisions of NRS chapter 645 and NAC  
24 chapter 645.

25 **FACTUAL ALLEGATIONS**

26 1. At all times relevant to this Complaint, RESPONDENT has not been licensed by the  
27 Division as a Real Estate Broker, Real Estate Broker-Salesperson, or a Real Estate Salesperson in the  
28 State of Nevada.



1 **NOTICE OF HEARING**

2 **PLEASE TAKE NOTICE**, that a disciplinary hearing has been set to consider the  
3 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B and  
4 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada Administrative Code.

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

14 **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at the same  
15 time as part of a regular meeting of the Commission that is expected to last from June 16, 2020,  
16 through June 18, 2020, or earlier if the business of the Commission is concluded. Thus, your  
17 hearing may be continued until later in the day or from day to day. It is your responsibility to be  
18 present when your case is called. If you are not present when your hearing is called, a default  
19 may be entered against you and the Commission may decide the case as if all allegations in the  
20 complaint were true. If you have any questions please call Evelyn Pattee, Commission  
21 Coordinator (702) 486-4074.

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

27 As the Respondent, you are specifically informed that you have the right to appear and be heard  
28 in your defense, either personally or through your counsel of choice. At the hearing, the Division has

1 the burden of proving the allegations in the complaint and will call witnesses and present evidence  
2 against you. You have the right to respond and to present relevant evidence and argument on all issues  
3 involved.

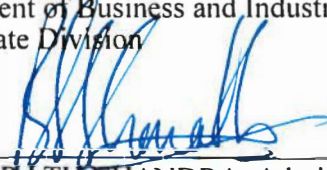
4 You have the right to call and examine witnesses, introduce exhibits, and cross-examine  
5 opposing witnesses on any matter relevant to the issues involved.

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

10 The purpose of the hearing is to determine if the Respondent has violated NRS 645 or NAC 645  
11 and if the allegations contained herein are substantially proven by the evidence presented and to further  
12 determine what administrative penalty, if any, is to be assessed against the Respondent, pursuant to  
13 NRS 645.235 and NRS 622.400.

14 DATED this 12 day of May, 2020.

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

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

22 AARON D. FORD  
23 Attorney General

24 By: / s / Dennis L. Belcourt  
25 DENNIS L. BELCOURT (Bar. No. 2658)  
26 Deputy Attorney General  
27 555 E. Washington Avenue, Suite 3900  
28 Las Vegas, Nevada 89101  
(702) 486-3326  
Attorneys for Real Estate Division