

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

**FILED**

JUL 31 2020

REAL ESTATE COMMISSION

Case Nos.: 2018-1029

By *Emily Patten*

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

Petitioner,

vs.

ROBYN L. HADEM,

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, Aaron D. Ford, Attorney General of the State of Nevada, and Robert E. Werbicky, Deputy Attorney General, hereby notifies RESPONDENT ROBYN L. HADEM ("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 at all relevant times mentioned in this Complaint was licensed as a broker 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 by the Division as a Salesperson, S.0182503, since August 7, 2017 and that license is currently in active status.
2. As of September 6, 2018 the supervising broker is Mark R. Desrochers, B.1000689.INDV.

1 3. Prior to September 6, 2018 the supervising broker was Damon Caldwell of Realty One  
2 Group, Inc., B.0143673.CORP.

3 4. On or about August 1, 2018, the Administrator of the Real Estate Division issued  
4 RESPONDENT a Notice of Violation with the Imposition of Administrative Fine in the amount of  
5 \$500.00 for a violation of NAC 645.610(c).

6 5. The Notice of Violation with Imposition of Administrative Fine was properly served upon  
7 RESPONDENT.

8 6. The Notice of Violation and accompanying letter from the Division advised that the fine  
9 must be remitted to the Division by September 3, 2018.

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

13 8. RESPONDENT did not appeal and did not request a hearing prior to September 3, 2018.

14 9. On or about September 26, 2018 the Division sent an e-mail to RESPONDENT reminding  
15 her of the violation and that payment of the fine was past due.

16 10. On or about November 30, 2018 the Division sent a letter, return receipt requested, to  
17 RESPONDENT again seeking payment of the fine or an initiation of an appeal.

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

19 **VIOLATIONS**

20 RESPONDENT has committed the following violations of law:

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

23 **DISCIPLINE AUTHORIZED**

24 13. Pursuant to NRS 645.630 and NRS 645.633, the Commission is empowered to impose  
25 an administrative fine per violation against RESPONDENT that may not exceed \$10,000, and further to  
26 suspend, revoke or place conditions on the license of RESPONDENT.

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

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

6 **NOTICE OF HEARING**

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

10 **THE HEARING WILL TAKE PLACE** at the Commission meeting scheduled for September  
11 1-3, 2020, beginning at approximately 9:00 a.m. each day, or until such time as the Commission  
12 concludes its business.

13 If the Governor's Emergency Directive 006 - suspending physical location requirements - is  
14 extended through the date of the meeting, then the hearing will be held via virtual meeting. The  
15 Commission uses WebEx for its meetings. To join the hearing go to the Webex.com website and put in  
16 the Access code and Attendee ID:

17 **TUESDAY, SEPTEMBER 1, 2020** Meeting number (Access code): 146 276 8028 Password  
18 (Attendee ID): MgCrCbJq662 (64272257662 from phones and video systems)

19 **WEDNESDAY, SEPTEMBER 2, 2020** Meeting number (Access code): 146 650 1911 Password  
20 (Attendee ID): 2rGzteBYY24 (27498329924 from phones and video systems)

21 **THURSDAY, SEPTEMBER 3, 2020** Meeting number (Access code): 146 520 3582 Password  
22 (Attendee ID): umV3mJJ2gP2 (86836552472 from phones and video systems)

23 If you do not have internet access, you may attend by phone at 1-844-621-3956 using the access  
24 codes and attendee IDs listed above. Some mobile devices may ask attendees to enter a numeric attendee  
25 ID provided above. If Emergency Directive 006 is not extended and the meeting is held in person, then  
26 the meeting will be located at the following locations:

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1 Nevada State Business Center  
2 Real Estate Division  
3 3300 West Sahara Avenue, Suite 350  
4 Las Vegas, NV 89102

5 If you would like an email containing this information, before the hearing, please contact Evelyn Pattee,  
6 Commission Coordinator, at (702) 486-4074 or [epattee@red.nv.gov](mailto:epattee@red.nv.gov).

7 **STACKED CALENDAR: Your hearing is one of several hearings scheduled at the same**  
8 **time as part of a regular meeting of the Commission that is expected to last from September 1,**  
9 **2020, through September 3, 2020, but may end earlier if the business of the Commission is**  
10 **concluded. Thus, your hearing may be continued until later in the day or from day to day. It is**  
11 **your responsibility to be present when your case is called. If you are not present when your hearing**  
12 **is called, a default may be entered against you and the Commission may decide the case as if all**  
13 **allegations in the complaint were true. If you have any questions please call Evelyn Pattee,**  
14 **Commission Coordinator (702) 486-4074.**

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

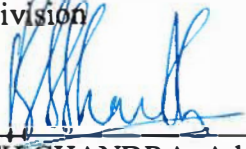
20 As the Respondent, you are specifically informed that you have the right to appear and be heard  
21 in your defense, either personally or through your counsel of choice. At the hearing, the Division has the  
22 burden of proving the allegations in the complaint and will call witnesses and present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

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

1 The purpose of the hearing is to determine if the Respondent has violated NRS 645 or NAC 645  
2 and if the allegations contained herein are substantially proven by the evidence presented and to further  
3 determine what administrative penalty, if any, is to be assessed against the Respondent, pursuant to NRS  
4 645.235 or NRS 645.230.

5 DATED this 29 day of July, 2020.

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

9 By:   
10 SHARATH CHANDRA, Administrator  
11 3300 West Sahara Avenue, Suite 350  
12 Las Vegas, Nevada 89102

13 AARON D. FORD  
14 Attorney General

15 By:           / s / Robert E. Werbicky            
16 ROBERT E. WERBICKY (Bar No. 6166)  
17 Deputy Attorney General  
18 555 E. Washington Avenue, Suite 3900  
19 Las Vegas, Nevada 89101  
20 (702) 486-3326  
21 Attorneys for Real Estate Division  
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