

FEB 25 2022

REAL ESTATE COMMISSION
BY *[Signature]*

**BEFORE THE REAL ESTATE COMMISSION
STATE OF NEVADA**

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

Petitioner,

vs.

CHRISTINE DANG,
(BS.0145107.LLC)

Respondent.

Case No. 2021-209

**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 Alexander Quagge, Deputy Attorney General, hereby notifies RESPONDENT CHRISTINE DANG ("RESPONDENT") of the instant Complaint and Notice of Hearing. An administrative hearing will be held before the STATE OF NEVADA REAL ESTATE COMMISSION ("Commission") to allow the Respondent to present her case. The hearing will be held pursuant to Chapters 233B and 645 of the Nevada Revised Statutes ("NRS") as well as 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 or other discipline authorized by NRS 645.630, NRS 645.633, NRS 645.635, and/or NRS 622.400, if violations of law are proven.

JURISDICTION

RESPONDENT engaged in activities which require a license as a real estate broker, real estate broker-salesperson, or real estate salesperson, and/or a permit to engage in property management, issued by the Division and is therefore subject to the jurisdiction of the Division and the Commission, and provisions of NRS and NAC 645.

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1 **FACTUAL ALLEGATIONS**

2 1. At all times relevant, RESPONDENT held a Nevada Broker Salesperson
3 License, BS.0145107.LLC, issued by the Division on January 19, 2017.

4 2. At all times relevant, RESPONDENT held a Property Manager Permit,
5 PM.0166124, issued by the Division on May 2, 2014.

6 3. RESPONDENT's Property Manager Permit is currently in inactive status.

7 4. On or about March 1, 2021, the Division received a complaint/statement of
8 fact from Jenny Tran (Complainant) regarding RESPONDENT's property management of
9 4833 Straight Flush Dr. #102, Las Vegas, NV 89122 ("Straight Flush Property").

10 5. The Complainant alleged that RESPONDENT mismanaged the subject
11 property and failed to evict tenants for nonpayment of rent.

12 6. At all times relevant, RESPONDENT conducted business as "Dang Good
13 Realty."

14 **RESPONDENT Managed Complainant's Properties.**

15 7. In March 2019, Complainant hired RESPONDENT as the property manager
16 for the Straight Flush Property.

17 8. Between August and September 2019, Complainant hired RESPONDENT as
18 her agent to purchase an investment property located at 4793 Vista Sandia Way, Las
19 Vegas, NV 89115 ("Vista Sandia Property").

20 9. Shortly after Complainant purchased the Vista Sandia Property,
21 RESPONDENT, doing business as Dang Good Realty, listed that property for rent on or
22 about September 7, 2019.

23 10. On October 6, 2019, RESPONDENT, doing business as Dang Good Realty,
24 entered into a residential lease agreement as the property manager for the Vista Sandia
25 Property. RESPONDENT's initial's "CD" appear as the "Landlord's Initials" on each page
26 of the document.

27 11. In March 2020, new tenants requested to lease the Straight Flush Property.
28

1 12. On March 20, 2020, RESPONDENT, doing business as Dang Good Realty,
2 entered into a residential lease agreement as the property manager for the Straight
3 Flush Property. RESPONDENT's initial's "CD" appear as the "Landlord's Initials" on
4 each page of the document.

5 13. On or about March 20, 2020, RESPONDENT received the first month's rent
6 for the Straight Flush Property from the tenants' friend.

7 14. On April 10, 2020, Complainant notified RESPONDENT that she had not
8 received rent for the month of March for the Straight Flush Property.

9 15. On April 11, 2020, RESPONDENT told Complainant that she does not "do
10 accounting until the second week once funds clear." RESPONDENT also told
11 Complainant that the tenant did not pay March rent and informed her about the repairs
12 and maintenance she was conducting on the property.

13 16. On April 19, 2020, RESPONDENT told Complainant that Complainant
14 should have received February's rent payment in the amount of \$1,436 for one property
15 and \$920 for the other property. RESPONDENT also informed Complainant that she
16 would not see a deposit to her account because RESPONDENT's management fees for the
17 Straight Flush Property were due in April.

18 17. On May 5, 2020, Complainant asked RESPONDENT who pays for the
19 Republic Services bill for the Vista Sandia Property. RESPONDENT informed
20 Complainant that she believed she collects the Republic Services payment with the rent.

21 18. From May 2020 to July 2020, RESPONDENT remained in contact with the
22 Straight Flush Property tenants regarding their nonpayment of rent.

23 19. On June 6, 2020, RESPONDENT relayed a message to Complainant from
24 the Straight Flush Property tenant that the tenant will pay rent soon.

25 20. On June 15, 2020, Complainant asked RESPONDENT about the status of
26 the Vista Sandia Property's rent payment. RESPONDENT told her that she was behind
27 on accounting due to COVID-19. RESPONDENT also informed her that the Straight
28 Flush Property did not pay rent.

1 21. On July 24, 2020, Complainant asked RESPONDENT about the payments
2 from the Vista Sandia and Straight Flush properties. RESPONDENT told Complainant
3 that she would call the Straight Flush tenants in the morning, but they have been
4 nonresponsive.

5 22. In August 2020, Complainant terminated her relationship with
6 RESPONDENT and hired Lori Smith as her new property manager for her properties.

7 23. On August 31, 2020, RESPONDENT emailed Lori Smith noting that she
8 only received the first month's rent for the Straight Flush Property. RESPONDENT
9 noted that she received the rent payment from the tenants' friend.

10 24. On December 28, 2020, RESPONDENT sent Complainant property owner
11 statements and operating statements for the Vista Sandia and Straight Flush properties.
12 Each of these statements listed the contact information for Dang Good Realty, and the
13 statements were generated by the TenantCloud property management software.

14 **RESPONDENT Was Not Forthcoming with Her Brokerage.**

15 25. From January 19, 2017, until June 9, 2021, RESPONDENT was associated
16 with the brokerage firm eXp Realty.

17 26. On March 24, 2021, RESPONDENT's broker, Spencer Walden, submitted an
18 affidavit to the Division in response to this investigation.

19 27. RESPONDENT did not make her broker, Mr. Walden, aware of the
20 transactions involving the Straight Flush Property. Mr. Walden noted that eXp Realty
21 does not allow its agents to conduct property management. Mr. Walden also noted that
22 eXp Realty has not received any funds or management fees, and eXp Realty would not
23 accept any of those types of funds because the brokerage does not engage in property
24 management.

25 28. When Mr. Walden confronted RESPONDENT about the facts surrounding
26 the Straight Flush Property, RESPONDENT told Mr. Walden that she did not manage
27 the property and did not accept any funds from the tenant.

1 29. RESPONDENT did not inform her broker about managing the Vista Sandia
2 Property.

3 30. In addition to the Straight Flush and Vista Sandia properties,
4 RESPONDENT received Yelp reviews regarding her property management services on
5 November 15, 2018, and February 14, 2017. These Yelp reviews were for properties
6 separate and distinct from the Vista Sandia and Straight Flush properties.

7 31. RESPONDENT did not inform her broker about managing the properties
8 mentioned in the Yelp reviews.

9 **RESPONDENT Was Not Forthcoming with The Division.**

10 32. On March 18, 2021, RESPONDENT submitted an affidavit to the Division in
11 response to this investigation.

12 33. In RESPONDENT's March 18, 2021, affidavit, RESPONDENT swore that
13 she did not sign a contract for property management.

14 34. On November 11, 2021, RESPONDENT emailed the Division and attached a
15 17-page document titled "documents for Division." On page 2 of the "documents for
16 Division" document, RESPONDENT attached a detailed response to the complaint, titled
17 "Affidavit from Christine Dang in response to Division Complaint Explanation of
18 allegations," ("November 11 Affidavit").

19 35. In RESPONDENT's November 11 Affidavit, RESPONDENT swore that she
20 told Complainant that she would not charge her for property management and would not
21 do property management for her.

22 36. On March 20, 2020, RESPONDENT, doing business as Dang Good Realty,
23 entered into a residential lease agreement as the property manager for the Straight
24 Flush Property.

25 37. On the March 20, 2020, Residential Lease Agreement, RESPONDENT's
26 initial's "CD" appear as the "Landlord's Initials" on each page of the document.

27 38. On April 19, 2020, RESPONDENT informed Complainant that she would be
28 charging her management fees for the Straight Flush Property.

1 **VIOLATIONS ALLEGED**

2 39. Between March 2019, and April 2020, RESPONDENT violated NRS
3 645.280(2) and NRS 645.630(1)(c) by accepting compensation from a person other than her
4 broker for managing the Straight Flush Property.

5 40. Between October 6, 2019, and August 31, 2020, RESPONDENT violated NRS
6 645.280(2) and NRS 645.630(1)(c) by accepting compensation from a person other than her
7 broker for managing the Vista Sandia Property.

8 41. Between October 6, 2019, and August 31, 2020, RESPONDENT violated NRS
9 645.630(1)(i) by failing to place the property management fees for the Vista Sandia
10 Property in the custody of her licensed broker.

11 42. Between March 2019, and April 2020, RESPONDENT violated NRS
12 645.630(1)(i) by failing to place the property management fees for the Straight Flush
13 Property in the custody of her licensed broker.

14 43. On or about March 18, 2021, RESPONDENT violated NRS 645.633(1)(i), as
15 explained by NAC 645.605(11)(e), by failing to disclose in her March 18, 2021, affidavit to
16 the Division that she managed the Straight Flush Property.

17 44. On or about November 11, 2021, RESPONDENT violated NRS 645.633(1)(i),
18 as explained by NAC 645.605(11)(c), by falsely stating in her November 11 affidavit that
19 she did not manage the Straight Flush Property.

20 45. On or about March 18, 2021, RESPONDENT violated NRS 645.635(6) for
21 failing to produce to the Division documents or records concerning the Straight Flush
22 Property investigation.

23 46. Between on or about March 2019, and August 2020, RESPONDENT violated
24 NRS 645.633(1)(h), as explained by NAC 645.605(7), for failing to ensure that the
25 agreement for property management between RESPONDENT and Complainant was
26 contained in a written agreement that has been signed by all parties and that her real
27 estate broker and each party to the real estate transaction had a copy of the written
28 agreement.

1 47. Between March 2019, and August 2020, RESPONDENT violated NRS
2 645.630(1)(e) by failing to maintain, for review and audit by the Division, the property
3 management agreement she entered with the Complainant.

4 **DISCIPLINE AUTHORIZED**

5 48. Pursuant to NRS 645.630, NRS 645.633, and NRS 633.635 the Commission is
6 empowered to impose an administrative fine of up to \$10,000 per violation against
7 RESPONDENT and further to suspend, revoke or place conditions on the license of
8 RESPONDENT. The Commission may impose any combination of those actions.

9 49. Additionally, under NRS 622.400, the Commission is authorized to impose
10 costs of the proceeding upon RESPONDENT, including investigative costs and attorney's
11 fees, if the Commission otherwise imposes discipline on Respondent.

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

14 **NOTICE OF HEARING**

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

19 **THE HEARING WILL TAKE PLACE on March 29, 2022, commencing**
20 **at 9:00 a.m., or as soon thereafter as the Commission is able to hear the matter,**
21 **and each day thereafter commencing at 9:00 a.m. through March 31, 2022, or**
22 **earlier if the business of the Commission is concluded. The Commission meeting**
23 **will be held on March 29, 2022, at the Nevada State Business Center, 3300 West**
24 **Sahara Avenue, 4th Floor – Tahoe Room, Las Vegas, Nevada 89102. The meeting**
25 **will continue on March 30, 2022, at the Nevada State Business Center, 3300 West**
26 **Sahara Avenue, 4th Floor – Tahoe Room, Las Vegas, Nevada 89102, commencing**
27 **at 9:00 a.m., and on March 31, 2022, should business not be concluded, starting at**
28

1 9:00 a.m. at the Nevada State Business Center, 3300 West Sahara Avenue, 4th
2 Floor – Tahoe Room, Las Vegas, Nevada 89102.

3 If the meeting will not be conducted in person, then you will be notified by
4 known email or mail as soon as possible that the Commission will conduct a
5 virtual meeting using Webex.com with the meeting information as follows:

6 DIAL-IN NUMBER: (844) 621-3956 or Webex.com

7
8 TUESDAY, MARCH 29, 2022 - MEETING NUMBER ACCESS CODE: 2492 043 1496

9 MEETING PASSWORD: 38YerzTWmU3 (38937989683 from phones and video
10 systems)

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12 WEDNESDAY, MARCH 30, 2022 - MEETING NUMBER ACCESS CODE: 2487 420

13 4399

14 MEETING PASSWORD: Kmmix976v52 (56649976852 from phones and video
15 systems)

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17 THURSDAY, MARCH 31, 2022 - MEETING NUMBER ACCESS CODE: 2486 415

18 0596

19 MEETING PASSWORD: MjPpJCFs723 (65775237723 from phones and video
20 systems)

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22 **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at
23 the same time as part of a regular meeting of the Commission that is expected to
24 last from March 29, 2022, through March 31, 2022, or earlier if the business of the
25 Commission is concluded. Thus, your hearing may be continued until later in the
26 day or from day to day. It is your responsibility to be present when your case is
27 called. If you are not present when your hearing is called, a default may be
28 entered against you and the Commission may decide the case as if all allegations

1 in the complaint were true. If you have any questions please call Evelyn Pattee,
2 Commission Coordinator (702) 486-4074.

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

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

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

22 The purpose of the hearing is to determine if the RESPONDENT has violated NRS
23 645 and/or NAC 645 and if the allegations contained herein are substantially proven by

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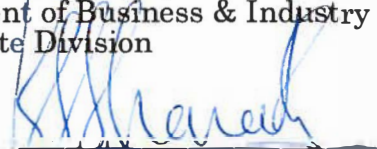
1 the evidence presented and to further determine what administrative penalty, if any, is to
2 be assessed against the RESPONDENT.

3
4 DATED this 24 day of February, 2022.

DATED this 24th day of February, 2022.

5 STATE OF NEVADA,
6 Department of Business & Industry
Real Estate Division

AARON D. FORD
Attorney General

7
8 By: 
SHARATH CHANDRA
Administrator
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Las Vegas, Nevada 89102

By: /s/ Alexander E. Quagge
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Attorneys for the Real Estate Division

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