

FEB 25 2022

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

REAL ESTATE COMMISSION
BY *Emily R. Patton*

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

Case No. 2021-285

**COMPLAINT AND NOTICE OF
HEARING**

Petitioner,

vs.

CHARITY SABRINA HART,
(S.0067938)

Respondent.

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 SABRINA CHARITY HART ("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 his 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 645.647 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 Real Estate Salesperson
3 License, S.0067938, issued by the Division on October 18, 2005.

4 2. On August 9, 2021, the Division sent RESPONDENT a Notice of Violation
5 with Imposition of Administrative Fine for violating NRS 645.252(2) and NRS 645.635(2).
6 The Division ordered RESPONDENT to pay an administrative fine of \$1,000 on or before
7 September 9, 2021.

8 3. As of the date of filing this complaint, RESPONDENT has not paid the
9 administrative fine.

10 **VIOLATIONS ALLEGED**

11 4. RESPONDENT violated NRS 645.647(2), for failing to pay the administrative
12 fine to the Division.

13 **DISCIPLINE AUTHORIZED**

14 5. Pursuant to NRS 645.647(2), in addition to any other remedy or penalty, the
15 Commission may suspend or revoke the license of a person who has failed to pay money
16 which the person owes to the Division.

17 6. Additionally, under NRS 622.400, the Commission is authorized to impose
18 costs of the proceeding upon RESPONDENT, including investigative costs and attorney's
19 fees, if the Commission otherwise imposes discipline on Respondent.

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

22 **NOTICE OF HEARING**

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

27 **THE HEARING WILL TAKE PLACE on March 29, 2022, commencing**
28 **at 9:00 a.m., or as soon thereafter as the Commission is able to hear the matter,**

1 and each day thereafter commencing at 9:00 a.m. through March 31, 2022, or
2 earlier if the business of the Commission is concluded. The Commission meeting
3 will be held on March 29, 2022, at the Nevada State Business Center, 3300 West
4 Sahara Avenue, 4th Floor – Tahoe Room, Las Vegas, Nevada 89102. The meeting
5 will continue on March 30, 2022, at the Nevada State Business Center, 3300 West
6 Sahara Avenue, 4th Floor – Tahoe Room, Las Vegas, Nevada 89102, commencing
7 at 9:00 a.m., and on March 31, 2022, should business not be concluded, starting at
8 9:00 a.m. at the Nevada State Business Center, 3300 West Sahara Avenue, 4th
9 Floor – Tahoe Room, Las Vegas, Nevada 89102.

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

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

14
15 **TUESDAY, MARCH 29, 2022 - MEETING NUMBER ACCESS CODE: 2492 043 1496**
16 **MEETING PASSWORD: 38YerzTWmU3 (38937989683 from phones and video**
17 **systems)**

18
19 **WEDNESDAY, MARCH 30, 2022 - MEETING NUMBER ACCESS CODE: 2487 420**
20 **4399**

21 **MEETING PASSWORD: Kmmix976v52 (56649976852 from phones and video**
22 **systems)**

23
24 **THURSDAY, MARCH 31, 2022 - MEETING NUMBER ACCESS CODE: 2486 415**
25 **0596**

26 **MEETING PASSWORD: MjPpJCFs723 (65775237723 from phones and video**
27 **systems)**

1 **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at
2 the same time as part of a regular meeting of the Commission that is expected to
3 last from March 29, 2022, through March 31, 2022, or earlier if the business of the
4 Commission is concluded. Thus, your hearing may be continued until later in the
5 day or from day to day. It is your responsibility to be present when your case is
6 called. If you are not present when your hearing is called, a default may be
7 entered against you and the Commission may decide the case as if all allegations
8 in the complaint were true. If you have any questions please call Evelyn Pattee,
9 Commission Coordinator (702) 486-4074.

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

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

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

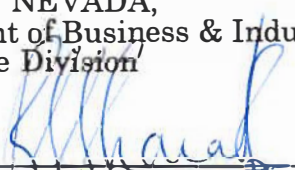
1 The purpose of the hearing is to determine if the RESPONDENT has violated NRS
2 645 and/or NAC 645 and if the allegations contained herein are substantially proven by
3 the evidence presented and to further determine what administrative penalty, if any, is to
4 be assessed against the RESPONDENT.

5 DATED this 24 day of February, 2022.

DATED this 23rd day of February, 2022.

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

AARON D. FORD
Attorney General

8 By: 
9 ~~SHARATH CHANDRA~~
Administrator
10 3300 W. Sahara Avenue, Ste. 350
Las Vegas, Nevada 89102

By: /s/ Alexander E. Quagge
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