

FEB 25 2022

REAL ESTATE COMMISSION
BY *Evelyn Patton*

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

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

Petitioner,

vs.

JASON MATTSON,
(B.1000577.LLC)

Respondent.

Case No. 2020-549

**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 JASON MATTSON ("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 645.633 and/or NAC 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.

///

1 **FACTUAL ALLEGATIONS**

2 1. At all times relevant, RESPONDENT held a Nevada Real Estate Broker
3 License, B.1000577.LLC, issued by the Division on January 8, 2010.

4 2. On June 24, 2020, the Division received a complaint from Ryan M. Craig
5 (“Complainant”). The Complaint alleged RESPONDENT improperly listed the property
6 located at 10629 San Sicily St., Las Vegas, NV 89141 (“subject property”) as available on
7 the MLS.

8 3. RESPONDENT was the seller’s agent and listing agent for the subject
9 property.

10 4. On February 6, 2020, RESPONDENT’s client accepted an offer on the subject
11 property and an escrow account was opened. Subsequently, the subject property’s listing
12 on MLS was removed.

13 5. On June 3, 2020, RESPONDENT relisted the subject property on the MLS as
14 available (A-ER status). The property was still under contract with an open escrow with
15 the February 6, 2020, buyer.

16 6. After RESPONDENT listed the subject property, Complainant’s agent, Jill
17 Amsel (BS.0063646), called RESPONDENT on June 3, 2020, to discuss the availability of
18 the subject property.

19 7. During their phone conversation on June 3, 2020, RESPONDENT led Amsel
20 to believe that the seller was in the process of canceling the original contract, and
21 RESPONDENT told Amsel to have Complainant submit an offer.

22 8. On June 4, 2020, Complainant submitted an offer on the subject property.

23 9. After a series of counteroffers, RESPONDENT’s seller accepted the offer on
24 June 10, 2020.

25 10. On June 12, 2020, Complainant was contacted by the title company referenced
26 in the subject property’s listing. The title company gave Complainant instructions for the
27 earnest money deposit and escrow.

1 fees, if the Commission otherwise imposes discipline on Respondent.

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

4 **NOTICE OF HEARING**

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

9 **THE HEARING WILL TAKE PLACE on March 29, 2022, commencing at 9:00**
10 **a.m., or as soon thereafter as the Commission is able to hear the matter, and each**
11 **day thereafter commencing at 9:00 a.m. through March 31, 2022, or earlier if the**
12 **business of the Commission is concluded. The Commission meeting will be held**
13 **on March 29, 2022, at the Nevada State Business Center, 3300 West Sahara**
14 **Avenue, 4th Floor – Tahoe Room, Las Vegas, Nevada 89102. The meeting will**
15 **continue on March 30, 2022, at the Nevada State Business Center, 3300 West**
16 **Sahara Avenue, 4th Floor – Tahoe Room, Las Vegas, Nevada 89102, commencing**
17 **at 9:00 a.m., and on March 31, 2022, should business not be concluded, starting at**
18 **9:00 a.m. at the Nevada State Business Center, 3300 West Sahara Avenue, 4th**
19 **Floor – Tahoe Room, Las Vegas, Nevada 89102.**

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

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

24
25 **TUESDAY, MARCH 29, 2022 - MEETING NUMBER ACCESS CODE: 2492 043 1496**
26 **MEETING PASSWORD: 38YerzTWmU3 (38937989683 from phones and video**
27 **systems)**

1 **WEDNESDAY, MARCH 30, 2022 - MEETING NUMBER ACCESS CODE: 2487 420**
2 **4399**

3 **MEETING PASSWORD: Kmmix976v52 (56649976852 from phones and video**
4 **systems)**

5
6 **THURSDAY, MARCH 31, 2022 - MEETING NUMBER ACCESS CODE: 2486 415**
7 **0596**

8 **MEETING PASSWORD: MjPpJCFs723 (65775237723 from phones and video**
9 **systems)**

10
11 **STACKED CALENDAR: Your hearing is one of several hearings scheduled at**
12 **the same time as part of a regular meeting of the Commission that is expected to**
13 **last from March 29, 2022, through March 31, 2022, or earlier if the business of the**
14 **Commission is concluded. Thus, your hearing may be continued until later in the**
15 **day or from day to day. It is your responsibility to be present when your case is**
16 **called. If you are not present when your hearing is called, a default may be**
17 **entered against you and the Commission may decide the case as if all allegations**
18 **in the complaint were true. If you have any questions please call Evelyn Pattee,**
19 **Commission Coordinator (702) 486-4074.**

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

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

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

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


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

14 DATED this 24 day of February, 2022.

DATED this 24th day of February, 2022.

15 STATE OF NEVADA,
16 Department of Business & Industry
17 Real Estate Division

AARON D. FORD
Attorney General

18 By: 
19 SHARATH CHANDRA
20 Administrator
21 3300 W. Sahara Avenue, Ste. 350
22 Las Vegas, Nevada 89102

By: /s/ Alexander E. Quagge
ALEXANDER E. QUAGGE
Deputy Attorney General
Bar No. 13938
100 North Carson Street
Carson City, Nevada 89701
Tel: (775) 684-1223

Attorneys for the Real Estate Division

23
24
25
26
27
28