

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,

7 Petitioner,

8 vs.

9 PHILBERT WILSON,
10 (B.1001034.LLC, B.1002757.INDV,
11 BS.1001034, PM.0163519)

12 Respondent.

Case No. 2022-182

FILED

JUL 11 2023

REAL ESTATE COMMISSION

BY Kesley Valadez

13 **COMPLAINT AND NOTICE OF HEARING**

14 The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY
15 OF THE STATE OF NEVADA ("Division") hereby notifies RESPONDENT PHILBERT WILSON
16 ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL ESTATE
17 COMMISSION ("Commission"). The hearing will be held pursuant to Chapters 233B and Chapter 645
18 of the Nevada Revised Statutes ("NRS") and Chapter 645 of the Nevada Administrative Code ("NAC").
19 The purpose of the hearing is to consider the allegations stated below and to determine if the
20 RESPONDENT should be subject to an administrative penalty as set forth in NRS 645.630 and/or NRS
21 622.400, and the discipline to be imposed, if violations of law are proven.

22 **JURISDICTION**

23 RESPONDENT, at all relevant times mentioned in this Complaint, was licensed as a Broker under
24 license numbers B.1001034.LLC and B.1002757.INDV, and has licenses BS.1001034 and PM.0163519.
25 RESPONDENT is, therefore, subject to the jurisdiction of the Division and the Commission, and the
26 provisions of NRS chapter 645 and NAC chapter 645.

27 **FACTUAL ALLEGATIONS**

28 1. Beginning on or about October 7, 2021, Quantified Investment Group hired the
RESPONDENT to be its broker. *NRED 0041.*

...

1 **be entered against you and the Commission may decide the case as if all allegations in the complaint**
2 **were true. If you have any questions, please call Kelly Valadez, Commission Coordinator at (702)**
3 **486-4606.**

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

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

15 You have the right to request that the Commission issue subpoenas to compel witnesses to testify
16 and/or evidence to be offered on your behalf. In making the request, you may be required to demonstrate
17 the relevance of the witness’ testimony and/or evidence. Other important rights you have are listed in
18 NRS 645.680 through 645.990, NRS Chapter 233B, and NAC 645.810 through 645.875.

19 The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or NAC
20 645 and if the allegations contained herein are substantially proven by the evidence presented and to

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1 further determine what administrative penalty is to be assessed against the RESPONDENT, if any,
2 pursuant to NRS 645.235, 645.633 and or 645.630.

3 DATED this 11 day of July 2023.

State of Nevada
Department of Business and Industry
Real Estate Division

By: 

SHARATH CHANDRA, Administrator
CHARVEZ FOGER, Deputy Administrator
3300 West Sahara Avenue, Suite 350
Las Vegas, Nevada 89102

9 DATED this 10th day of July 2023.

AARON D. FORD
Attorney General

By: Daren Gonzalez

DAREN GONZALEZ (Level 2 Certification
of Limited Practice Under SCR 49.3 dated
June 8, 2023)
CHRISTAL P. KEEGAN (Bar No. 12725)
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Attorneys for Real Estate Division

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