

PHILBERT WILSON  
8008 CETUS CIR # 201  
LAS VEGAS, NEVADA 89128  
702 592 3835

**FILED**

JUL 20 2023

REAL ESTATE COMMISSION

BY Kelley Valaden

TO: DAREN GONZALEZ  
LEGAL INTERN  
STATE OF NEVADA  
OFFICE OF THE ATTORNEY GENERAL

RE: CASE NO. 2022-182

BE ADVISED THAT I DID ACT AS A BROKER FOR THE QUANTIFIED INVESTMENT GROUP DURING THE PERIOD MENTIONED IN YOUR INTRODUCTORY LETTER, DATED JULY 11, 2023, AND I COULD POSSIBLY BE RESPONSIBLE FOR THE VIOLATIONS STATED IN THE FILED CASE #2023-182.

FIRST, I WOULD LIKE TO BRING TO YOUR ATTENTION THE WEBSITE IN QUESTION WITH THE STATED NRS 645.300 VIOLATIONS THAT DEPICTS NRS 645.633, NAC 645.610, AND NAC 645.600 WAS UP AND RUNNING DURING THE TENURE OF TWO SEASONED AND RESPECTED BROKERS, TONY KEEP AND KENNETH DAVIDSON WITH MR. KEEP'S PROFILING HIS VAST KNOWLEDGE OF REAL ESTATE COMPLIANCE AND REGULATION GUIDELINES. BOTH BROKERS SPENT A CONSIDERABLE AMOUNT OF TIME BROKERING FOR QUANTIFIED INVESTMENTS BEFORE MY TIME AS BROKER.

AFTER READING THE ALLEGATIONS, I CAME TO THE CONCLUSION; A VENDETTA OR SOME FORM OF RETALIATION EXIST BETWEEN THE PAST BROKER, TONY KEEP, AND THE COMPANY'S OWNER, AJAY DAYAL. BASED ON THE REPORTED ALLEGATION AND THE RESPONSE GIVEN BY THE STATE INSPECTOR, JAN HOLLE, REF NRED 0030, I WOULD LIKE TO CALL THESE INDIVIDUALS; AJAY DAYAL, TONY KEEP, AND JAN HOLLE TO THE SCHEDULED HEARING SET FOR AUGUST 22 -24, 2023.

AS A BROKER FOR THE QUANTIFIED INVESTMENT GROUP I COULD NOT GET THE OWNER TO RELINQUISH DAILY ACTIVITIES OR TO REVEAL AND OR SHARE THE CONTACT INFORMATION FOR THE WEBSITE BUILDER / DESIGNER. IF THE REQUESTED INFORMATION WOULD HAVE BEEN AVAILABLE, WE WOULD NOT BE HERE DECIDING THE FAITH OF A COMPANY AND THIS BROKER'S FAITH. FRANKLY, IF THE CHANGES HAD BEEN MADE, THE WEBSITE WOULD HAVE BEEN COMPLIANT AND SATISFYING ALL OF NRS 645.300 REGULATIONS. MORE OFTEN THAN I CAN COUNT I FOUND MYSELF DEBATING THE OWNER REGARDING THE DECEPTIVE PRACTICE OF HAVING PICTURES OF PAST AGENTS DISPLAYED ON OUR COMPANY'S WEBSITE AND NOT ACTING ON THE PROMISES OF ADDING THE BROKER'S PROPERTY MANAGEMENT LICENSE TO THE WEBSITE. I COULD HAVE WALKED AWAY WHEN THE OWNER DID NOT HEED MY DEMAND FOR CHANGES TO THE WEBSITE. LEAVING WOULD HAVE PLACED OR DENIED OTHER AGENTS A CHANCE TO EARN A LIVING.

MAYBE THE OBSTINATE BEHAVIOR AND OR THE LACK OF INTENT TO CHANGE WAS ALSO DIRECTED TOWARD MY PREDECESSOR(S). I COULD ONLY IMAGINE THE CAUSE OF THE RIFT BETWEEN THE TWO PARTIES BECAUSE I HAD ENDURED THE STUBBORN ATTITUDE OF THIS OWNER WHO BELIEVED AND SHOWED HIS WAY WAS THE RIGHT WAY. AS A CONSEQUENCE, I COULD ONLY ASK THAT YOU ALLOW TONY KEEP TO SHARE HIS TENURE AS A BROKER AND DECIDE IF THERE WERE SIMILAR PATTERNS IN THE BROKER-OWNER RELATION AS I HAD EXPERIENCE AS BROKER. AFTER ALL, IT IS MR. KEEP'S COMPLAINT BROUGHT ON AND OR RAISED SUSPICIONS OF ILLEGALITY AND USHERED IN THE CURRENT STATE OF AFFAIRS WITH THE DIVISION AND THE REAL ESTATE COMMISSION.

(1) I WOULD LIKE TO HEAR FROM JAN HOLLE AS A WITNESS BECAUSE IN REPLYING TO TONY KEEP'S COMPLAINT, MR. HOLLE STATES, THE BROKER PAID A FINE BUT HE DID NOT MAKE THE CORRECTIONS TO THE WEBSITE. A CLARIFICATION IS NEEDED AS TO WHY JAN HOLLE DID NOT VISIT THE OFFICE AND ENGAGED THE BROKER IN A CONVERSATION REGARDING THE ILLS OF THE COMPANY'S WEBSITE IN CONJUNCTION WITH THE MISLEADING ADVERTISEMENT THAT THE COMPLAINT OUTLINED IN HIS ALLIGATIONS. I BELIEVE THE NAME-DROPPING OF KNOWING SOMEONE IN A POSITION WOULD HAVE BEEN REALIZED AND THOSE REQUIRED CHANGES WOULD BE MET.

(2) BE ADVISED AS A BROKER FOR QUANTIFIED INVESTMENT, I NEVER WROTE, DELIVERED, OR MAILED OUT A CHECK TO THE DIVISION REGARDING THE VIOLATIONS AND

(3) CERTIFIED MAIL(S) THAT CAME FROM THE DIVISION AND ADDRESSED TO ME, NEVER WAS TURNED OVER TO ME FOR MY ACKNOWLEDGMENT AND MY RESPONSE TO THE DIVISION, JAN HOLLE AND MARIA MARTIN.

NOT TURNING OVER THE CERTIFIED MAIL TO THE BROKER COULD BE CONSTRUED AS A DELIBERATE AND PLANNED ACTION LIKE THE COVERING UP OF ACTIVITIES IN PROPERTY MANAGEMENT THAT TONY KEEP ALLUDED TO IN THE ALLEGATIONS. AGAIN, THE PATTERN OF NOT BEING OPEN WITH THE BROKER(S) LENDS SUSPICION OF DECEPTION AND I'M COMPELL TO SAY IT REACHES BACK AS FAR AS TONY KEEP, KENNETH DAVIDSON TIME PERIOD, AND THROUGHOUT NERMINA CELIKOVIC TIME AS SECRETARY.

IT NEVER DAWNED UPON ME THAT NERMINA CELIKOVIC WAS MY ASSISTANT WHILE I WAS BROKERING FOR THE COMPANY. I RECALL MY INTRODUCTION TO HER AS THE SECRETARY TO THE OWNER. HOWEVER, CASE # 2022-182 SHOWS HER AS MY ASSISTANT IN THE OUTGOING PROPERTY MANAGEMENT MAILOUTS. REF NERD 0030 TO 0035. NERMINA'S DAILY TASKS, INSTRUCTIONS, NAMED POSITIONS, AND JOB FUNCTIONS ORIGINATED FROM THE OWNER AND NOT FROM THE BROKER. REF NRED 0031-0035 RENT COLLECTIONS BETWEEN NERMINA AND A LANDLORD(S)

I WAS KEPT AWAY AND NEVER WAS I INTRODUCED TO ATTORNEY BRANDON PHILLIPS. I HAD NEITHER MEET WITH HIM NOR WAS I PRIVILEGED TO GET HIS CONTACT INFORMATION. IF I WAS GIVEN THE OPPORTUNITY, AND LATTITUDE TO MEET HIM THEN, ALL THE MENTIONED VIOLATIONS WOULD HAVE BEEN HANDLED DIFFERENTLY WHERE THE COMPANY WOULD HAVE SHIFTED INTO A COMPLIANCE MODE WITH THE DIVISION.

SAD TO SAY, BRANDON PHILLIPS REPRESENTS MY INTERESTS AND SPOKE ON MY BEHALF WITHOUT TALKING TO ME. I FIND THAT TO BE A STRANGE WAY OF DOING BUSINESS. BUT THEN AGAIN, I RECOGNIZED THAT MR. PHILLIPS WAS PROBABLY TAKING ORDERS FROM THE SAME OWNER WHO HAD

NIXED MY REQUESTS TO BE IN COMPLIANCE WITH NRS 645.300 SECTIONS AND ADVERTISEMENT GUIDELINES.

YOURS TRULY

PHILBERT WILSON.

07/17/2023

PHILBERT

07/17/2023

Pitilbert Wilson  
8008 Cetus Cir. # 201  
Las Vegas, NV 89128

LAS VEGAS NV 890  
18 JUL 2023 PM 5 L



Crystal P Keegan  
Deputy Attorney General  
5420 Kietzke Lane #202  
RENO NEVADA 89511

**RECEIVED**  
JUL 20 2023 TB  
ATTORNEY GENERAL  
RENO OFFICE

89511-206252

