

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 PATRICK M. SAVARIN,

10 Respondent.

Case No. 2021-341

FILED

NOV 04 2022

REAL ESTATE COMMISSION

BY Kelley Valadez

11 **COMPLAINT AND NOTICE OF HEARING**

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

20 **JURISDICTION**

21 RESPONDENT was at all relevant times mentioned in this Complaint licensed as a Salesperson
22 under license number S.0169010 and is therefore subject to the jurisdiction of the Division and the
23 Commission, and the provisions of NRS chapter 645 and NAC chapter 645.

24 **FACTUAL ALLEGATIONS**

25 1. In or about March 2021, RESPONDENT represented the seller of real property located
26 at 211 Prairie Creek Street Henderson, Nevada 89012 (the “Property”). NRED 000243-52.

27 2. On March 18, 2021, the parties, through their respective agents, entered into a residential
28 purchase agreement (“RPA”) for the Property. NRED 000080-93.

1 earlier if the business of the Commission is concluded. The Commission meeting
2 will be held on December 13, 2022, at the Nevada State Business Center, 3300 West
3 Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102. The meeting
4 will continue on December 14, 2022, at the Nevada State Business Center, 3300
5 West Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102,
6 commencing at 9:00 a.m., and on December 15, 2022, should business not be
7 concluded, starting at 9:00 a.m. at the Nevada State Business Center, 3300 West
8 Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102.

9 **STACKED CALENDAR:** Your hearing is one of several hearings scheduled
10 at the same time as part of a regular meeting of the Commission that is expected
11 to last from December 13, 2022, through December 15, 2022, or earlier if the
12 business of the Commission is concluded. Thus, your hearing may be continued
13 until later in the day or from day to day. It is your responsibility to be present
14 when your case is called. If you are not present when your hearing is called, a
15 default may be entered against you and the Commission may decide the case as
16 if all allegations in the complaint were true. If you have any questions please call
17 Kelly Valadez, Commission Coordinator (702) 486-4606.

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

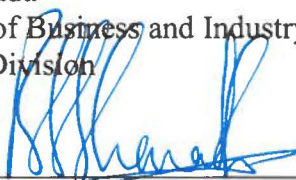
23 As the Respondent, you are specifically informed that you have the right to appear and be heard
24 in your defense, either personally or through your counsel of choice. At the hearing, the Division has the
25 burden of proving the allegations in the complaint and will call witnesses and present evidence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

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

5 The purpose of the hearing is to determine if the Respondent has violated NRS Chapter 645 and/or
6 NAC Chapter 645 and if the allegations contained herein are substantially proven by the evidence
7 presented and to further determine what administrative penalty is to be assessed against the
8 RESPONDENT, if any, pursuant to NRS 645.235, 645.633 and or 645.630.

9
10 DATED this 3 day of November, 2022.

11 State of Nevada
12 Department of Business and Industry
13 Real Estate Division

14 By: 
15 SHARATH CHANDRA, Administrator
16 3300 West Sahara Avenue, Suite 350
17 Las Vegas, Nevada 89102

18 AARON D. FORD
19 Attorney General

20 By: */s/ Alma Orozco*
21 ALMA OROZCO (Bar No. 15300)
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