

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 MARSHALL CARRASCO,
10 (B.1000579.INDV - Active)

11 Respondent.

Case Nos. 2021-1122 and 2022-120

FILED

DEC 01 2023

REAL ESTATE COMMISSION
BY 

12 **PETITIONER'S MOTION TO DISMISS RESPONDENT'S MOTION
13 FOR RECONSIDERATION OF DISCIPLINE AND, ALTERNATIVELY
14 PETITION FOR REHEARING**

15 The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY
16 OF THE STATE OF NEVADA ("Division"), by and through its attorneys of record, Aaron D. Ford,
17 Attorney General, and Christal P. Keegan, Deputy Attorney General, brings this Motion to Dismiss
18 Respondent's Motion for Reconsideration of Discipline and, Alternatively Petition for Rehearing.

19 **I. Introduction**

20 This is about the Respondent Marshall Carrasco's refusal to accept the Commission's affirmed
21 orders and comes again and again attempting to relitigate the same arguments to convince the
22 Commission to review its default order entered on August 31, 2023 and so affirmed in its Order Denying
23 Motion for Rehearing filed November 15, 2023 against him where he was assessed administrative fines
24 and to pay the Division incurred costs in the approximate total amount due of \$103,366.77, in addition
25 to the revocation of his broker's license. On September 29, 2023, Mr. Carrasco formally appealed this
26 matter for judicial review (CV23-01732), and therefore the jurisdiction of this matter sits with the District
27 Court.

28 **II. Respondent's Reconsideration of Discipline Should Be Dismissed because it is Time-Barred.**

Pursuant to NRS 622A.390, Mr. Carrasco's request for reconsideration is time-barred. The
August 31, 2023, default order was the final decision, and Mr. Carrasco should have filed a petition for

1 reconsideration within 15 days from that date. Instead, Mr. Carrasco, through his various counsel,
2 decidedly chose to request a rehearing, not a reconsideration of disciplinary terms.

3 Further, because Mr. Carrasco had requested a rehearing, his request was placed on the November
4 2023 Notice & Agenda as such under Item 4. For Possible Action: Discussion and Decision Regarding
5 Respondents' *Petition for Rehearing* of Disciplinary Action, and pursuant to NRS 241.020, the Nevada
6 Real Estate Commission ("Commission") could not take action on items not listed on the agenda
7 (emphasis added). Any inclusion of this request on subsequent agendas deviates from the law's exclusion
8 of untimely requests and allows Mr. Carrasco to pile on meritless claims on the Commission's docket.

9 **III. Respondent's Re-Petition for Rehearing Should be Dismissed because the Commission has**
10 **already DENIED his original Petition for Rehearing filed on September 15, 2023.**

11 Mr. Carrasco's pleas in the alternative are time-barred pursuant to NRS 233B.130(4) since Mr.
12 Carrasco's original Petition for Rehearing filed on September 15, 2023, was denied. Mr. Carrasco
13 confuses the subsequent Order Denying Motion for Rehearing filed November 15, 2023, as the final
14 order, but NRS 233B.130(4) clearly deems the default order filed August 31, 2023, as the final decision.
15 Furthermore, Mr. Carrasco's Re-Petition misapplies NRS 622A.390 by improperly treating the
16 November 7, 2023, meeting as a hearing when it not a "hearing" under NRS 622A.380, and NAC 645.820
17 clearly state the "original hearings" which would be the August 22, 2023 meetings where case numbers
18 2021-1122 and 2022-120 were heard.

19 Finally, the Division would not relitigate issues already presented and decided upon but in
20 consideration of Mr. Carrasco's pending judicial appeal (CV23-01732), it will concisely dispose of each
21 cause or ground alleged:

22 **a) No Irregularity in the Original Proceedings Occurred.**

23 Pursuant to NAC 645.860, the Commission precisely followed the statutory framework when a
24 party fails to appear and in exercising its lawful authority to revoke Mr. Carrasco's licenses and the
25 imposition of administrative fines. In fact, Mr. Carrasco admits the discipline the Commission's ordered
26 "are the maximum allowable under the law". *Respondent's Motion, Filed November 28, 2023, Pg. 1, Ln.*
27 *18.*

28 ...

1 **b) No Accident or Surprise Existed.**

2 Mr. Carrasco was on notice of the discipline authorized as expressly plead in the Division’s filed
3 Complaints, Case 2021-1122 filed March 28, 2023, and Case 2022-120 filed March 29, 2023. Mr.
4 Carrasco admits he knew his request for a continuance was denied but it was not “desirous” for him to
5 appear at his hearing, “despite that he could participate remotely.” *Respondent’s Motion, Filed November*
6 *28, 2023, Exhibit A Affidavit of Marshall Carrasco, Pg. 2, Items 12 and 14, and Respondent’s Motion,*
7 *Filed November 28, 2023, Pg. 2, Lines 33-34.* The fact that Mr. Carrasco failed to appreciate the
8 significance of his failure to appear and prioritized his desires over his disciplinary hearings, even though
9 he had the ability to be present at the hearing, is inconsistent with the policy interest in favor of deciding
10 cases on the merits rather than default.

11 **c) No Newly Discovered Material Evidence Has Been Presented.**

12 Mr. Carrasco acknowledges that the material evidence presented in his Exhibit A Affidavit and
13 exhibits attached thereto could have been previously produced, except for the Exhibit I Proof of Payment
14 – CLE Courses, which does not concern the times relevant to these cases and is immaterial, and therefore,
15 Mr. Carrasco has not proven any previously unavailable or unknown new evidence.

16 **d) No Error in Law Occurred at the Hearing.**

17 It is only in Mr. Carrasco’s *Third* contention under his Re-Petition’s Section D. Error in Law¹
18 where he discusses alleged irregularities in the original hearings on August 22, 2023, and therefore the
19 Division will respond specifically to those:

- 20 (1) his request for continuance for a family emergency was denied, despite
21 its compliance with NAC 645.830;

22 Per NAC 645.830(1), the Commission holds the discretion to grant or deny continuances. It is
23 Mr. Carrasco’s opinion that his second requests for a continuance were made in good faith and not merely
24 for delay, but his cases were continued for three months to accommodate his need to consult with an
25 attorney and set six (6) months later at the August 2023 meeting where he “could participate remotely”
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27

28

¹ Respondent’s Motion for Reconsideration of Discipline and, Alternatively Petition for Rehearing,
Filed November 28, 2023, Page 9, Lines 14-23, continuing to Page 10, Lines 1-4.

1 but because it was not “desirous” for him to appear remotely he plainly chose not to.² *Respondent’s*
2 *Motion, Filed November 28, 2023, Exhibit A Affidavit of Marshall Carrasco, Pg. 2, Items 12 and 14, and*
3 *Respondent’s Motion, Filed November 28, 2023, Pg. 2, Lines 33-34.*

4 Then Mr. Carrasco’s Rehearing Petition was heard another three (3) months later at the November
5 2023 Meeting, whereby he was essentially asking for a hearing which would occur yet another three (3)
6 months thereafter, kicking this matter down the road for nearly a year.

7 (2) the proceedings went forward without opposition or any mention of
8 Mr. Carrasco’s answer to the Complaints or factual defenses thereto previously
9 communicated to the Commission, thereby largely eschewing Mr. Carrasco’s due
process rights in favor of the decision to deny the continuance request; and

10 The proceedings went forward pursuant to NAC 645.860 Failure of party to appear at hearing.
11 The audio file from the original hearings demonstrates the Division mentioned Respondent’s Answer to
12 the Complaints Filed April 18, 2023, to the Commission. *Audio File, August 22, 2023 Commission*
13 *Meeting, NRED v Marshall Carrasco Case No. 2022-120, Begins at approx.3:17:33, and NRED v*
14 *Marshall Carrasco Case No. 2021-1122, Begins at approx. 3:52:49.*

15 (3) that the penalty levied was the maximum monetary fine, along with the revocation
16 of his license with no mention of a suspension or condition(s) placed on his license,
despite those possibilities being expressly plead in the Complaint.

17 Lastly, the Division is not required to mention options in its disciplinary recommendations to the
18 Commission, and Mr. Carrasco has admitted the discipline the Commission’s ordered are allowable under
19 the law. *Respondent’s Motion, Filed November 28, 2023, Pg. 1, Line 18.*

20 **IV. Conclusion**

21 The Commission did not deny Mr. Carrasco the ability to timely file for reconsideration 15 days
22 from the August 31, 2023 default order. As the administrative record clearly reflects, Mr. Carrasco
23

24 _____
25 ² Respondents and/or their counsel appear by remote technology systems regularly, and the
26 approximate virtual attendee numbers for the August and November 2023 meetings support it is
utilized significantly for participation:

27 8-22-23 85 virtual attendees
28 8-23-23 31 virtual attendees
11-7-23 81 virtual attendees
11-8-23 61 virtual attendees
11-9-23 17 virtual attendees

1 desired a rehearing and this continues to be further evidenced by his Motion accompanied by re-pleading
2 his rehearing request in the alternative.

3 Mr. Carrasco should not be able to relitigate his underlying petition for rehearing over and over
4 because he cannot accept the Commission's decision. Despite Mr. Carrasco arguing that his re-petition
5 is supported by NAC 645.820(1), it is not; pursuant to section (7) of NAC 645.820, the Commission has
6 already discussed and unanimously decided not to grant Mr. Carrasco a rehearing. The Commission has
7 issued its Order Denying Motion for Rehearing filed November 15, 2023, and therefore, the jurisdiction
8 of this matter is before the District Court where the Respondent's appeal is pending (Exhibit A).

9
10 DATED this 1st day of December 2023.

11
12 AARON D. FORD
13 Attorney General

14 By: *epkeegan*
15 CHRISTAL P. KEEGAN, ESQ.
16 Deputy Attorney General
17 Bar No. 12725
18 5420 Kietzke Lane #202
19 Reno, Nevada 89511
20 (775) 687-2141
21 ckeegan@ag.nv.gov

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25
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28
Attorney for Real Estate Division

EXHIBIT A

1 CODE
2 HAL TAYLOR, ESQ.
3 Nevada State Bar #4399
4 2551 W. Lakeridge Shores
5 Reno, NV 89519
6 TEL: (775) 825-2223
7 FAX: (775) 329-1113
8 (HalTaylorLawyer@GBIS.com)
9 Attorney for Petitioner

10 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
11 IN AND FOR THE COUNTY OF WASHOE

12 MARSHALL CARRASCO

13 Petitioner,

Case No.:

14 vs.

Dept. No.:

15 SHARATH CHANDRA, Administrator,

16 REAL ESTATE DIVISION,

17 DEPARTMENT OF BUSINESS &

18 INDUSTRY, STATE OF NEVADA,

19 Respondent.

20 **PETITION FOR JUDICIAL REVIEW**

21 Petitioner, MARSHAL CARRASCO, through his attorney, Hal Taylor, Esq.,
22 hereby petitions for judicial review pursuant to NRS 233B.130 of two Findings of
23 Fact, Conclusions of Law and Orders by the Respondent, the Real Estate Divisions,
24 Department of Business & Industry (Sharath Chandra, Administrator) ("Board),
25 revoking Petitioner's license as a real estate broker the State of Nevada and
26 imposing additional fines and costs (attached hereto as Exhibits A & B and referred
27 to herein collectively as "Board Orders").
28

1 **Procedural Background**

2 On August 31, 2023, Respondent entered the Board Orders in two cases
3 (Board Case Nos. 2022-120 & 2021-1122), revoking the Petitioner's license to
4 practice as a real estate broker in the State of Nevada and imposing other fines and
5 costs.

6 The underlying charges generally relate to a failure by the Respondent to
7 adequately act to prevent a real estate salesperson in his office from engaging in
8 the practice of real estate while the salesperson's license had not been renewed
9 and was therefore inactive. Petitioner has admitted that in retrospect he had not
10 monitored the licensure status of the salesperson adequately, but wished to present
11 significant evidence to the Board that he acted good-faith in reliance on information
12 given to him by various agencies and third parties that led him to believe that the
13 agent had an active license during the relevant period.

14 These Orders were entered by default upon Respondent's denial of the
15 Petitioner's request for a second continuance of the hearing on these matters due to
16 his being out of the country on a family medical emergency. As a consequences,
17 the Petitioner was unable to properly present evidence to certain of the allegations
18 made in these two cases. In particular the Petitioner was not able to present facts
19 in mitigation of the penalties imposed that may have given the Board a basis for
20 less severe penalties than the revocation of his license.

21 This Petition is filed within thirty days of service of these Orders on the
22 Petitioner.

23 **Basis for Appeal**

- 24 1. The Decision of the Respondent is:
- 25 a) In violation of constitutional or statutory provisions;
 - 26 b) In excess of the statutory authority of the Respondent;
 - 27 c) Made upon unlawful procedure;
 - 28 d) Affected by error of law;

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e) Clearly erroneous in view of the reliable, probative and substantial evidence on the whole record, or

f) Arbitrary or capricious or characterized by abuse of discretion.

WHEREFORE, the Petitioner prays that the Court will stay the disciplines imposed by the Board Orders, and remand this matter back to the Respondent for further proceedings related to the discipline imposed, and grant such other relief as the Court deems just.

AFFIRMATION PURSUANT TO NRS 239B.030

By signature below, the undersigned affirms that the preceding document does not contain the social security number of any person.

Dated: September 29, 2023.

HAL TAYLOR, ESQ.
2551 W. Lakeridge Shores.
Reno, Nevada 89519
(775) 825-2223

/Hal Taylor/_____

HAL TAYLOR
Attorney for Petitioner

Exhibit A
Case No. 2021-1122

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

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

Petitioner,

vs.

MARSHALL CARRASCO,
(B.1000579.INDV)

Respondent.

Case No. 2021-1122

FILED

AUG 31 2023

REAL ESTATE COMMISSION

BY Kelly Valadez

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

This matter came on for hearing before the Real Estate Commission, Department of Business and Industry, State of Nevada (the "Commission"), during a regular agenda set for a three-day stack commencing August 22, 2023 (the "Hearing"). RESPONDENT Marshall Carrasco ("RESPONDENT") did not appear in person, through counsel, or otherwise. Christal Park Keegan, Esq., Deputy Attorney General with the Nevada Attorney General's Office, appeared on behalf of the Real Estate Division of the Department of Business and Industry, State of Nevada (the "Division").

The Division's counsel advised the Commission that RESPONDENT was aware of his attendance at the hearing, and that his hearing was scheduled for the May 2-4, 2023 hearings, but the RESPONDENT requested a continuance, which the Commission granted. The Division sent the RESPONDENT Meeting Re-Notices no later than 30 days prior to the August 22-24, 2023 hearings. The RESPONDENT asked for a second continuance, which the Commission denied. The RESPONDENT submitted his request for a second continuance again, which remained denied by the Commission.

Therefore, the Division proceeded with a default pursuant to NAC 645.860. The Division's Commission Coordinator testified regarding proper notice to the RESPONDENT. The Commission found proof of service of the Complaint and Notice of Hearing, Notice of Complaint and Obligation to Respond, and Notice of Documents with documents numbered NRED 000001-000073 was made.

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1 After hearing testimony presented in this matter and for good cause appearing, the Commission
2 now enters its Findings of Fact, Conclusions of Law and Order against RESPONDENT as follows:

3 **JURISDICTION**

4 RESPONDENT, at all relevant times mentioned in this Complaint, was actively licensed as a
5 Broker under license number B.1000579.INDV. RESPONDENT is, therefore, subject to the jurisdiction
6 of the Division and the Commission, and the provisions of NRS chapter 645 and NAC chapter 645.

7 **FINDINGS OF FACT**

8 At all times relevant to this Complaint, RESPONDENT was the listing agent for Complainant's
9 real property located at 2219 Kadden, Dayton, Nevada 89403 (the "Property"). *NRED 000033 - 000036.*

10 On or about September 2, 2021, RESPONDENT'S unlicensed agent, Tyler Richardson, met with
11 the Complainant in person to sign an Exclusive Right to Sell Contract for the Property. *NRED 000069.*

12 On April 4, 2022, in an email to the Division, RESPONDENT admitted his agent, Mr.
13 Richardson, met Complainant to sign the Exclusive Right to Sell Contract. *NRED 000006.*

14 Yet, the Exclusive Right to Sell Contract was executed electronically. *NRED 000033 - 000036.*

15 On June 7, 2022, RESPONDENT represented to the Division that his agent, Mr. Richardson, was
16 an active licensee at all times relevant. *NRED 000020 - 000021.*

17 But, RESPONDENT'S agent, Tyler Richardson, did not have an active license when he met with
18 the Complainant to sign the Exclusive Right to Sell Contract. *NRED 000004.*

19 On October 6, 2021, RESPONDENT'S inactive licensee, Mr. Richardson, emailed Complainant
20 listing information for comparables. *NRED 000064.*

21 On November 23, 2021, RESPONDENT'S inactive licensee, Mr. Richardson, emailed
22 Complainant listing information and links. *NRED 000073.*

23 But, RESPONDENT'S agent, Mr. Richardson, did not have an active license when he emailed
24 Complainant listing information. *NRED 000004.*

25 On or about September 2, 2021, the Complainant signed a Duties Owed by a Nevada Real Estate
26 Licensee (the "Duties Owed"). *NRED 000037.*

27 The Duties Owed only identified RESPONDENT as the licensee in the real estate transaction.
28 *NRED 000037.*

1 A Supplemental List of Licensees Party to the Duties Owed was not included.

2 From about September 28, 2021, to October 28, 2021, RESPONDENT'S licensee, Brylle Ireland,
3 sent numerous emails to Complainant regarding the Property transaction. *NRED 000028 000063, and*
4 *NRED 000065 - 000072.*

5 During which, on October 11, 2021, RESPONDENT'S licensee, Mr. Ireland, emailed
6 Complainant details of an offer to purchase the Property. *NRED 000065 - 000066.*

7 But, RESPONDENT'S licensee, Mr. Ireland, was not included on a Supplemental List of
8 Licensees Party to the Duties Owed.

9 On or about June 10, 2022, the Division noticed RESPONDENT of an Amended Notice of
10 Violation with Imposition of Administrative Fine in the amount of \$1,000.00 due by July 11, 2022.
11 *NRED 000012 - NRED 000019.*

12 On July 8, 2022, RESPONDENT appealed the Notice of Violation, and as such, this Complaint
13 now comes herewith. *NRED 000020.*

14 CONCLUSIONS OF LAW

15 Whereas the Commission found that the Division proved by a preponderance of the evidence the
16 foregoing findings of fact, and concludes by unanimous vote that the RESPONDENT committed the
17 following violations of law, as presented in the Complaint:

18 1. RESPONDENT violated NRS 645.633(1)(h) pursuant to NAC 645.600(1) by failing to
19 supervise his inactive licensed agent's activities acting in the capacity of a real estate licensee.

20 2. RESPONDENT violated NRS 645.252(3) by failing to list additional licensee involved in
21 the transaction for the Property on the Supplemental List of Licensees Party to the Duties Owed.

22 ORDER

23 The Commission, being fully apprised in the premises, and good cause appearing to the
24 Commission, by unanimous vote, ORDERS as follows:

25 1. RESPONDENT shall pay an administrative fine to the Division in the total amount of
26 \$25,166.61 ("Amount Due"), which includes a fine of \$20,000 for violations of law on five occasions
27 and \$5,166.61 for the Division's costs and attorney's fees, within ninety (90) days from the effective date
28 of this Order.

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2. All RESPONDENT'S licenses shall be revoked on the effective date of this Order.

3. If payment is not actually received by the Division on or before its due date, it shall be a default by RESPONDENT. In the event of default, the unpaid balance of the administrative fine and costs, together with any attorney's fees and costs that may have been assessed, shall be due in full to the Division within ten (10) calendar days of the date of default, and the Division may obtain a judgment for the amount owed, including collection fees and costs.

4. The Commission retains jurisdiction for correcting any errors that may have occurred in the drafting and issuance of this document.

5. This Order shall become effective thirty (30) days after the date of this Order.

Dated this 31 day of August, 2023.

NEVADA REAL ESTATE COMMISSION

By: David Tomp
Vice President, Nevada Real Estate Commission

Dated this 24th day of August, 2023

AARON D. FORD
Attorney General

By: epkeegan
CHRISTAL P. KEEGAN (Bar No. 12725)
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Attorneys for Real Estate Division

Exhibit B
Case No. 2022-120

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**BEFORE THE REAL ESTATE COMMISSION
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SHARATH CHANDRA, Administrator,
REAL ESTATE DIVISION, DEPARTMENT
OF BUSINESS & INDUSTRY,
STATE OF NEVADA,

Case No. 2022-120

Petitioner,

vs.

MARSHALL CARRASCO,
(B.1000579.INDV)

Respondent.

FILED

AUG 31 2023

REAL ESTATE COMMISSION

BY *Kelly Valadez*

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

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The Division's counsel advised the Commission that RESPONDENT was aware of his attendance at the hearing, and that his hearing was scheduled for the May 2-4, 2023 hearings, but the RESPONDENT requested a continuance, which the Commission granted. The Division sent the RESPONDENT Meeting Re-Notices no later than thirty (30) days prior to the August 22-24, 2023 hearings. The RESPONDENT asked for a second continuance, which the Commission denied. The RESPONDENT submitted his request for a second continuance again, which remained denied by the Commission.

Therefore, the Division proceeded with a default pursuant to NAC 645.860. The Division's Commission Coordinator testified regarding proper notice to the RESPONDENT. The Commission found proof of service of the Complaint and Notice of Hearing, Notice of Complaint and Obligation to Respond, and Notice of Documents with documents numbered NRED 000001 - 000454 was made.

///

1 After hearing testimony presented in this matter and for good cause appearing, the Commission
2 now enters its Findings of Fact, Conclusions of Law and Order against RESPONDENT as follows:

3 **JURISDICTION**

4 RESPONDENT, at all relevant times mentioned in this Complaint, was actively licensed as a
5 Broker under license number B.1000579.INDV. RESPONDENT is, therefore, subject to the jurisdiction
6 of the Division and the Commission, and the provisions of NRS chapter 645 and NAC chapter 645.

7 **FINDINGS OF FACT**

8 At all times relevant to this Complaint, RESPONDENT was the broker for his agent, licensee
9 Tyler Scott Richardson (S.0183650). *NRED 000004, NRED 000014.*

10 RESPONDENT failed to supervise his agent, Mr. Richardson, during periods of expired licensed
11 status between January 31, 2021, to February 2, 2022. *NRED 000040 – 000041, NRED 000031 – 000032,*
12 *NRED 000004, NRED 000017 – 000030, NRED 000169 – 000171, NRED 000409 – 000420,*
13 *NRED 000423 – 000426, NRED 000446, and NRED 000450 – 000452.*

14 RESPONDENT'S agent represented buyers in the transaction for the purchase of real property
15 located at 7115 Banbury Court, Reno, Nevada 89523 ("Property #1"). *NRED 000025.*

16 On June 22, 2021, the Property #1 sale closed. *NRED 000418 – 000420.*

17 On or about June 23, 2021, sales commissions for Property #1 were disbursed to
18 RESPONDENT'S brokerage in the total amount of \$23,375.00. *NRED 000420*

19 At all times relevant to the Property #1 transaction, RESPONDENT'S agent did not hold a valid
20 real estate license. *NRED 000004.*

21 RESPONDENT'S agent represented buyers in the transaction for the purchase of real property
22 located at 135 Blair Place, Reno, Nevada 89509 ("Property #2"). *NRED 000025.*

23 On July 21, 2021, the Property #2 sale closed. *NRED 000409 – 000410.*

24 On or about July 22, 2021, sales commissions for Property #2 were disbursed to
25 RESPONDENT'S brokerage in the total amount of \$21,747.50. *NRED 000409.*

26 At all times relevant to the Property #2 transaction, RESPONDENT'S agent did not hold a valid
27 real estate license. *NRED 000004.*

28 / / /

1 RESPONDENT's agent represented buyers in the transaction for the purchase of real property
2 located at 900 South Meadows Parkway, Reno, Nevada 89521 ("Property #3"). *NRED 000018.*

3 On July 21, 2021, the Property #3 sale closed. *NRED 000414 - 000415.*

4 On or about July 26, 2021, sales commissions for Property #3 were disbursed to
5 RESPONDENT'S brokerage in the total amount of \$8,125.00. *NRED 000414.*

6 At all times relevant to Property #3 transaction, RESPONDENT'S agent did not hold a valid real
7 estate license. *NRED 000004.*

8 RESPONDENT'S agent represented buyers in the transaction for the purchase of real property
9 located at 4301 Numaga Pass, Carson City, Nevada 89703 ("Property #4"). *NRED 000018.*

10 On July 30, 2021, the Property #4 sale closed. *NRED 000446.*

11 1. Sales commissions for Property #4 were disbursed to RESPONDENT'S brokerage in the
12 total amount of \$27,279.69. *NRED 000446.*

13 At all times relevant to Property #4 transaction, RESPONDENT'S agent did not hold a valid real
14 estate license. *NRED 000004.*

15 RESPONDENT's agent represented Complainants in the transaction for the purchase of real
16 property located at 992 Bench Road, Fallon, Nevada 89406 ("Property #5"). *NRED 000018.*

17 On August 30, 2021, the Property #5 sale closed. *NRED 000305 - 000311.*

18 Sales commissions for Property #5 were disbursed to RESPONDENT'S brokerage in the total
19 amount of \$17,737.50. *NRED 000306.*

20 At all times relevant to Property #5 transaction, RESPONDENT'S agent did not hold a valid real
21 estate license. *NRED 000004.*

22 RESPONDENT'S agent represented buyers in the transaction for the purchase of real property
23 located at 204 Agate Drive, Carson City, Nevada 89706 ("Property #6"). *NRED 000018.*

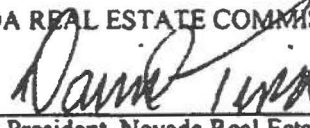
24 On September 15, 2021, the Property #6 sale closed. *NRED 000412 - 000413.*

25 Sales commissions for Property #6 were disbursed to RESPONDENT'S brokerage in the total
26 amount of \$9,551.25. *NRED 000411.*

27 At all times relevant to Property #6 transaction, RESPONDENT'S agent did not hold a valid real
28 estate license. *NRED 000004.*

1 Dated this 31 day of August, 2023

NEVADA REAL ESTATE COMMISSION

2
3 By: 
Vice President, Nevada Real Estate Commission

4
5 Dated this 24th day of August, 2023

6 AARON D. FORD
7 Attorney General

8 By: 
9 CHRISTAL P. KEEGAN (Bar No. 12725)
10 Deputy Attorney General
11 5420 Kietzke Lane, Suite 202
12 Reno, Nevada 89511
13 (775) 687-2141

Attorneys for Real Estate Division

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