

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Case No. 2023-522

Petitioner,

FILED

vs.

JAN 17 2024

MILENA GOODWIN,
B.1001005.INDV,

REAL ESTATE COMMISSION

BY *Kelley Valadez*

Respondent.

COMPLAINT AND NOTICE OF HEARING

The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY OF THE STATE OF NEVADA ("Division") hereby notifies RESPONDENT MILENA GOODWIN ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL ESTATE COMMISSION ("Commission"). The hearing will be held pursuant to Chapter 233B and Chapter 645 of the Nevada Revised Statutes ("NRS"), and 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 as set forth in NRS 645.806 (3), and the discipline to be imposed, if violations of law are proven.

JURISDICTION

RESPONDENT, at all relevant times mentioned in this Complaint, was actively licensed as a Broker (B.1001005.INDV). RESPONDENT is, therefore, subject to the jurisdiction of the Division and the Commission, and the provisions of NRS Chapter 645 and NAC Chapter 645. As of the date of this Complaint, RESPONDENT'S broker's license is in "active" status.

FACTUAL ALLEGATIONS

1. RESPONDENT'S Nevada Real Estate Broker license was first issued in May of 2012. [NRED0002].
2. In 2021, RESPONDENT failed to submit her mandatory broker annual reporting by the last day of the expiration month of her broker's license (May 31, 2021). [NRED0005].

1 conferencing to the Division of Insurance, 1818 E. College Parkway, Suite 103, Carson City,
2 Nevada 89706, until the business of the Commission is concluded.

3 **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at the same
4 time as part of a regular meeting of the Commission that is expected to last from February 20, 2024
5 through February 22, 2024, or earlier if the business of the Commission is concluded. Thus, your
6 hearing may be continued until later in the day or from day to day. It is your responsibility to be
7 present when your case is called. If you are not present when your hearing is called, a default may
8 be entered against you and the Commission may decide the case as if all allegations in the complaint
9 were true. If you have any questions please call Kelly Valadez, Commission Coordinator (702)
10 486-4606.

11 **YOUR RIGHTS AT THE HEARING:** except as mentioned below, the hearing is an open meeting
12 under Nevada's open meeting law, and may be attended by the public. After the evidence and arguments,
13 the commission may conduct a closed meeting to discuss your alleged misconduct or professional
14 competence. You are entitled to a copy of the transcript of the open and closed portions of the meeting,
15 although you must pay for the transcription.

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

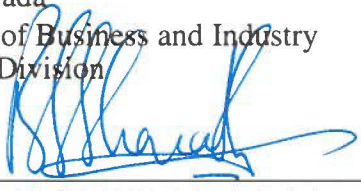
22 You have the right to request that the Commission issue subpoenas to compel witnesses to testify
23 and/or evidence to be offered on your behalf. In making the request, you may be required to demonstrate
24 the relevance of the witness' testimony and/or evidence. Other important rights you have are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

26 The purpose of the hearing is to determine if the Respondent has violated NAC 645 and/or NAC
27 645 and if the allegations contained herein are substantially proven by the evidence presented and
28 to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,

1 pursuant to NRS 645.235, 645.633 and or 645.630.

2 DATED this 16 day of JANUARY, 2024.

3 State of Nevada
4 Department of Business and Industry
5 Real Estate Division

6 By: 
7 SHARATH CHANDRA, Administrator
8 3300 West Sahara Avenue, Suite 350
9 Las Vegas, Nevada 89102

10 AARON D. FORD
11 Attorney General

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