





1 **NOTICE OF HEARING**

2 **PLEASE TAKE NOTICE**, that a disciplinary hearing has been set to consider the  
3 Administrative Complaint against the above-named RESPONDENT in accordance with Chapters 233B  
4 and 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada Administrative Code.

5 **THE HEARING WILL TAKE PLACE on May 14, 2024, commencing at 9:00 a.m., or as**  
6 **soon thereafter as the Commission is able to hear the matter, and each day thereafter commencing**  
7 **at 9:00 a.m. through May 16, 2024, or earlier if the business of the Commission is concluded at the**  
8 **Nevada State Business Center, 3300 West Sahara Avenue, 4th Floor – Nevada Room, Las Vegas,**  
9 **Nevada 89102 with video conferencing to Nevada Division of Insurance, 1818 E. College Parkway,**  
10 **Suite 103, Carson City, Nevada 89706.**

11 **STACKED CALENDAR: Your hearing is one of several hearings scheduled at the same**  
12 **time as part of a regular meeting of the Commission that is expected to last from May 14, 2024**  
13 **through May 16, 2024, or earlier if the business of the Commission is concluded. Thus, your**  
14 **hearing may be continued until later in the day or from day to day. It is your responsibility to be**  
15 **present when your case is called. If you are not present when your hearing is called, a default may**  
16 **be entered against you and the Commission may decide the case as if all allegations in the complaint**  
17 **were true. If you have any questions, please call Kelly Valadez, Commission Coordinator, at**  
18 **(702) 486-4606.**

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

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

1 involved. You have the right to call and examine witnesses, introduce exhibits, and cross-examine  
2 opposing witnesses on any matter relevant to the issues involved.

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


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

11 DATED this 21 day of March 2024.

DATED this 21st day of March 2024.

12 STATE OF NEVADA  
13 Department of Business and Industry  
14 Real Estate Division

AARON D. FORD  
Attorney General

15 By:   
16 SHARATH CHANDRA, Administrator  
17 CHARVEZ FOGER, Deputy Administrator  
18 3300 West Sahara Avenue, Suite 350  
19 Las Vegas, Nevada 89102

By:   
CHRISTAL P. KEEGAN, ESQ.  
Deputy Attorney General  
Bar No. 12725  
5420 Kietzke Lane #202  
Reno, Nevada 89511  
(775) 687-2141  
ckeegan@ag.nv.gov

*Attorney for Real Estate Division*