

1 **BEFORE THE REAL ESTATE COMMISSION**

2 **STATE OF NEVADA**

3 SHARATH CHANDRA, Administrator,  
4 REAL ESTATE DIVISION, DEPARTMENT  
5 OF BUSINESS AND INDUSTRY,  
6 STATE OF NEVADA,

7 Petitioner,

8 vs.

9 WILLIAM FRANCIS BEAUBIEN,  
10 (B.1002427.INDV, PM.0167754.BKR)

11 Respondent.

Case No. 2024-521

**FILED**

OCT 02 2024

REAL ESTATE COMMISSION

BY Kelly Valadez

12 **COMPLAINT AND NOTICE OF HEARING**

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

21 **JURISDICTION**

22 RESPONDENT, at all relevant times mentioned in this Complaint, was actively licensed as a  
23 broker (B.1002427.INDV). RESPONDENT is, therefore, subject to the jurisdiction of the Division and  
24 the Commission, and the provisions of NRS Chapter 645 and NAC Chapter 645. As of the date of this  
25 Complaint, RESPONDENT’S broker’s license is currently in “active” status.

26 **FACTUAL ALLEGATIONS**

- 27 1. RESPONDENT’S broker’s license was first issued in April of 2020. *NRED 000003.*  
28 2. In 2021, RESPONDENT timely submitted a completed 546A Form. *NRED 000004.*

1           3.       On or about May 13, 2022, as a courtesy, the Division informed the RESPONDENT of  
2 his requirement as a broker to submit the 546 or 546A Form. *NRED 000005.*

3           4.       That day, the RESPONDENT submitted his tardy Form 546A to the Division.  
4 *NRED 000004.*

5           5.       In 2023, RESPONDENT timely submitted a completed 546A Form. *NRED 000004.*

6           6.       But in 2024, the RESPONDENT failed to submit his Form 546A to the Division.  
7 *NRED 000006 – NRED 000010.*

8           7.       Therefore, on or about June 7, 2024, the Division sent the RESPONDENT a Notice  
9 of Violation requesting the required Form 546A and payment of the administrative fine of \$250.  
10 *NRED 000008 – NRED 000012.*

11          8.       In response, on or about July 23, 2024, the RESPONDENT claimed to not be familiar  
12 with this form. *NRED 000017.*

13          9.       The RESPONDENT also asked to “get off this requirement permanently”.  
14 *NRED 000017.*

15          10.      The RESPONDENT also stated if he was subject to this legal requirement he “may just  
16 let my license expire and never do business again in Nevada.” *NRED 000017.*

17          11.      Lastly, the RESPONDENT stated: “I certainly don’t need threatening letters and fines.”  
18 *NRED 000017.*

19          12.      After making his dissents known, RESPONDENT submitted his signed Form 546A to the  
20 Division and stated: “Let me know if this solves the problem.” *NRED 000016.*

21          13.      On or about July 24, 2024, the Division informed the RESPONDENT he still needed to  
22 remit payment of the \$250 fine. *NRED 000015.*

23          14.      On or about August 21, 2024, the Division informed the RESPONDENT that it would  
24 proceed formally due to his failure to remit the form due in April of 2024 or the fine. *NRED 000011.*

25          15.      On or about August 26, 2024, the Division’s letter was delivered to the RESPONDENT’S  
26 mailing address. *NRED 000012 – NRED 000013.*

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1 **VIOLATIONS OF LAW**

2 RESPONDENT committed the following violations of law:

3 1. RESPONDENT violated NRS 645.633(1)(b) pursuant to NAC 645.806(3) for failing to  
4 submit his Form 546A by the last day of his real estate license expiration month.

5 2. RESPONDENT violated NRS 645.633(1)(b) pursuant to NAC 645.695 for failing  
6 to pay the \$250 administrative fine levied by the Division for failure to timely submit the 2024  
7 Form 546A Affidavit.

8 **DISCIPLINE AUTHORIZED**

9 3. Pursuant to NRS 645.630 and NRS 645.633, the Commission is empowered to impose an  
10 administrative fine per violation against RESPONDENT that may not exceed \$10,000, and further to  
11 suspend, revoke, or place conditions on the license of RESPONDENT.

12 4. Additionally, under NRS 622.400, the Commission is authorized to impose costs of the  
13 proceeding upon RESPONDENT, including investigative costs and attorney’s fees, if the Commission  
14 otherwise imposes discipline on RESPONDENT.

15 5. Therefore, the Division requests that the Commission take such disciplinary action as it  
16 deems appropriate under the circumstances.

17 **NOTICE OF HEARING**

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

21 **THE HEARING WILL TAKE PLACE on November 19, 2024, commencing at 9:00 a.m.,**  
22 **or as soon thereafter as the Commission is able to hear the matter, and each day thereafter**  
23 **commencing at 9:00 a.m. through November 21, 2024, or earlier if the business of the Commission**  
24 **is concluded. The Commission meeting will be held on November 19, 2024, at the Nevada State**  
25 **Business Center, 3300 W. Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102**  
26 **with video conferencing to the Nevada Division of Insurance, 1818 E. College Parkway, Suite 103,**  
27 **Carson City, Nevada 89706. The meeting will continue on each day thereafter commencing at 9:00**  
28 **a.m. through November 21, 2024, until the business of the Commission is concluded.**

1           **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at the same  
2 time as part of a regular meeting of the Commission that is expected to last from November 19,  
3 2024 through November 21, 2024, or earlier if the business of the Commission is concluded. Thus,  
4 your hearing may be continued until later in the day or from day to day. It is your responsibility  
5 to be present when your case is called. If you are not present when your hearing is called, a default  
6 may be entered against you and the Commission may decide the case as if all allegations in the  
7 complaint were true. If you have any questions, please call Kelly Valadez, Commission  
8 Coordinator, at (702) 486-4606.

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

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

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

24           The purpose of the hearing is to determine if the RESPONDENT has violated NRS 645 and/or  
25 NAC 645 and if the allegations contained herein are substantially proven by the evidence presented and

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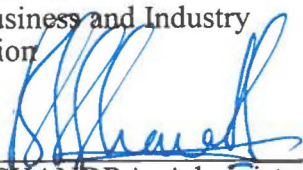
1 to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,  
2 pursuant to 645.633 and or 645.630.


3  
4 DATED this 30 day of September, 2024.

DATED this 27th day of September, 2024.

5 STATE OF NEVADA  
6 Department of Business and Industry  
7 Real Estate Division

AARON D. FORD  
Attorney General

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