

1 **BEFORE THE REAL ESTATE COMMISSION**

2 **STATE OF NEVADA**

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

Case No. 2024-165

5 Petitioner,

6 vs.

7 CHRISTOPHER B. CAGUIAT,  
8 (S.0181383)

9 Respondent.

**FILED**

OCT 04 2024

REAL ESTATE COMMISSION

BY Kelley Valadez

10  
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 CHRISTOPHER B.  
14 CAGUIAT ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL  
15 ESTATE COMMISSION ("Commission"). The hearing will be held pursuant to Chapter 233B and  
16 Chapter 645 of the Nevada Revised Statutes ("NRS") and Chapter 645 of the Nevada Administrative  
17 Code ("NAC"). The purpose of the hearing is to consider the allegations stated below and to determine  
18 if the RESPONDENT should be subject to an administrative penalty as set forth in NRS 645.630 and/or  
19 NRS 622.400, and the discipline to be imposed, if violations of law are proven.

20 **JURISDICTION**

21 RESPONDENT, at all relevant times mentioned in this Complaint, was actively licensed as a  
22 salesperson under license number S.0181383. RESPONDENT is, therefore, subject to the jurisdiction  
23 of the Division and the Commission, and the provisions of NRS Chapter 645 and NAC Chapter 645. As  
24 of the date of this Complaint, RESPONDENT'S license is in active status.

25 **FACTUAL ALLEGATIONS**

26 1. At all times relevant, the Complainant trusted the RESPONDENT to assist her with  
27 buying multiple investment properties with funds available from the sale of her residence in California.

28 NRED 000033.

1           2.       Around November of 2022, the RESPONDENT represented the Complainant as the  
2 purchaser on a new build home located at 432 Summer Triangle Drive, Reno, NV 89509. NRED 000033,  
3 NRED 000061 – 000085.

4           3.       During this transaction, the RESPONDENT induced the Complainant to be partner in his  
5 investment scheme. NRED 000033.

6           4.       Accordingly, on or about December 9, 2022, the Complainant sent approximately  
7 \$100,000 to RESPONDENT’S business account “Fast Cleaning Services” to invest in a property  
8 listed with the RESPONDENT located at 2250 Hunter Lake Drive, Reno, NV 89509 (“Property #1 -  
9 Hunter Lake”). NRED 000033, NRED 000034, NRED 000035 – 000036, NRED 000086 – 000092, and  
10 NRED 000198.

11          5.       On December 23, 2022, the RESPONDENT told the Complainant that she needed to  
12 contribute \$21,500 for rehab work on Property #1 – Hunter Lake. NRED 000198.

13          6.       The RESPONDENT also persuaded the Complainant by representing, “There’s at least  
14 25k profit each after you get back your 100k and the 21,500 for the rehab.” NRED 000198.

15          7.       On or about January 10th and 12th of 2023, the Complainant provided the RESPONDENT  
16 with \$21,500 for the alleged repairs on Property #1 - Hunter Lake. NRED 000034.

17          8.       On or about February 16, 2023, Property #1 – Hunter Lake was sold. NRED 000093.

18          9.       The Final Settlement Statement for Property #1 – Hunter Lake indicated \$125,000 was  
19 paid to the Complainant, “Investor (1) to Ma. Theresa Choco Lim.” NRED 000093.

20          10.       Also, during this time, on or about January 24, 2023, the Complainant provided the  
21 RESPONDENT with \$8,300 for alleged repairs on another investment property located at 1001 Keele  
22 Drive, Reno, NV 89509 (Property #2 – Keele Drive). NRED 000034.

23          11.       That same day, a Deed of Trust was made for a property located at 1401 Castle Way,  
24 Reno, NV 89502 (Property #3 – Castle Way), with the amount of \$8,300 listing the Complainant as  
25 beneficiary and recorded return to “Christopher Caguiat 190 W. Huffaker Lane., Suite 408, Reno, NV  
26 CA 89511.” NRED 000122 – 000143.

27          12.       Upon belief that the Deed of Trust was proof of her investment, on or about January 27,  
28 2023, the Complainant sent \$105,000 to RESPONDENT’S business account. NRED 000034.

1 13. Shortly thereafter on February 2, 2023, RESPONDENT emailed the Deed of Trust for  
2 Property #2 – Keele Drive with the amount of \$105,000 listing the Complainant as beneficiary and  
3 requesting recorded return to “Christopher Caguaiat 190 W. Huffaker Lane., Suite 408, Reno, NV CA  
4 89511.” NRED 000144 – 000164.

5 14. Upon belief that the Deed of Trust was proof of her investment, February 3, 2023, the  
6 Complainant sent even more money in the amount of \$18,750 for alleged repairs on for Property #2 –  
7 Keele Drive. NRED 000034, and NRED 000165.

8 15. Between about January 24, 2023 and February 3, 2023, the Complainant sent the  
9 RESPONDENT approximately \$132,050 to be invested into Property #2 – Keele Drive. NRED 000034,  
10 and NRED 000165.

11 16. On February 21, 2023, the RESPONDENT emailed the Complainant with “Investment  
12 updates 2/21/23” asking for more money, “\$71,800 needed from you to buy the property by  
13 Thursday/Friday. [smiley face emoji].” NRED 000165.

14 17. Between about February 22, 2023 and August 17, 2023, the Complainant sent the  
15 RESPONDENT approximately \$159,300 to invest in Property #3 – Castle Way. NRED 000034, and  
16 NRED 000167 – 000168.

17 18. On March 8, 2023, the RESPONDENT emailed the Complainant with “Investment  
18 updates 3/8/23” again asking for money for an unspecified “Mccloud [sic] Property” which he claimed  
19 “still needed \$35,000 to make it \$60,000 by Monday. [smiley face emoji]” NRED 000168.

20 19. On or about March 10, 2023, Complainant sent the RESPONDENT approximately  
21 \$35,000 to be invested into the McCloud Property (“Property #4 – McCloud”). NRED 000034.

22 20. On or about April 29, 2023, RESPONDENT commenced as the listing agent for Property  
23 #3 – Castle Way. NRED 000263 – 000266.

24 21. On or about September 15, 2023, RESPONDENT commenced as the listing agent for  
25 Property #2 – Keele Drive. NRED 000354 – 000357.

26 ...

27 ...

28 ...

1           22.     On October 3, 2023, RESPONDENT emailed a copy of the Accepted Offer on  
2 Property #2 – Keele Drive to the Complainant which demonstrated a purchase price of \$490,000.  
3 NRED 000172 – 000181.

4           23.     But on October 17, 2023, the Property #2 – Keele Drive transaction was cancelled.  
5 NRED 000340, and NRED 000407 – 000408.

6           24.     On November 16, 2023, RESPONDENT’S brokerage at the time terminated the  
7 RESPONDENT, “Due to borrowed money against opened escrows and continued inconsistencies.”  
8 NRED 000340, and NRED 000418.

9           25.     That same day, the RESPONDENT’S brokerage terminated the Exclusive Right to Sell  
10 agreement with the seller of Property #2 – Keele Drive. NRED 000340.

11           26.     On or about November 30, 2023, after numerous requests by the Complainant, the  
12 RESPONDENT finally sent what appeared to be a doctored Deed of Trust for Property #2 – Keele.  
13 NRED 000200 – 000222, and NRED 000095 – 000112.

14           27.     The RESPONDENT’S broker of record during the Property #2 – Keele Property  
15 transaction stated the RESPONDENT, “need[s] to be investigated by the proper authorities.”  
16 NRED 000034 – 000341.

17           28.     On or about February 26, 2024, the Division opened an investigation against the  
18 RESPONDENT. NRED 000011 – 000012.

19           29.     On or about March 25, 2024, the RESPONDENT supplied his response to the Division’s  
20 investigation wherein he stated, “I am fully responsible and agreed to doing what is necessary to reconcile  
21 and pay back the monies due.” NRED 000224 – 000226.

22           30.     On or about June 12, 2024, the Division informed the RESPONDENT it intended to  
23 commence formal action against him. NRED 000014 – 000015.

24           31.     Shortly thereafter, on June 25, 2024, the RESPONDENT entered into a Settlement  
25 Agreement and Release of All Claims with the Complainant and subsequently supplied it to the Division  
26 so that it would drop its case against the RESPONDENT. NRED 000227, and NRED 000228 – 000232.

27           32.     When all is said and done, the Complainant’s damages total approximately \$351,350  
28 invested with the RESPONDENT. NRED 000057, and NRED 000059.

**VIOLATIONS OF LAW**

RESPONDENT committed the following violations of law:

1. RESPONDENT violated NRS 645.633(1)(h) pursuant to NAC 645.605(1), on the First Count (Count #1), for committing grossly negligent and/or incompetent acts by supplying a deed of trust for Property #1 – Hunter Lake to his client which was never recorded.

2. RESPONDENT violated NRS 645.633(1)(h) pursuant to NAC 645.605(1), on the Second Count (Count #2), for committing grossly negligent and/or incompetent acts by supplying a deed of trust for Property #2 – Keele Drive to his client which was never recorded.

3. RESPONDENT violated NRS 645.633(1)(h) pursuant to NAC 645.605(1), on the Third Count (Count #3), for committing grossly negligent and/or incompetent acts for supplying a questionable deed of trust for Property #3 – Castle Way to his client which was never recorded.

4. RESPONDENT violated NRS 645.633(1)(i) pursuant to NAC 645.605(1), on the First Count (Count #1), for committing deceitful, fraudulent and/or dishonest dealings when he made material representations to his client regarding Property #1 – Hunter Lake.

5. RESPONDENT violated NRS 645.633(1)(i) pursuant to NAC 645.605(1), on the Second Count (Count #2), for committing deceitful, fraudulent and/or dishonest dealings when he made material representations to his client regarding Property #2 – Keele Drive.

6. RESPONDENT violated NRS 645.633(1)(i) pursuant to NAC 645.605(1), on the Third Count (Count #3), for committing deceitful, fraudulent and/or dishonest dealings when he made material representations to his client regarding Property #3 – Castle Way.

7. RESPONDENT violated NRS 645.630(1)(a), on the First Count (Count #1), for making material representations upon his client regarding Property #1 – Hunter Lake leading her to believe her investment was secured.

8. RESPONDENT violated NRS 645.630(1)(a), on the Second Count (Count #2), for making material representations upon his client regarding Property #2 - Keele Drive leading her to believe the property was sold.

...

...





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 arguments,  
11 the commission may conduct a closed meeting to discuss your alleged misconduct or professional  
12 competence. You are entitled to a copy of the transcript of the open and closed portions of the meeting,  
13 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

26 ...  
27 ...  
28 ...

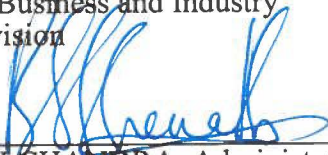
1 to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,  
2 pursuant to NRS 645.235, 645.633 and or 645.630.

3  
4 DATED this 3 day of October, 2024.

DATED this 3rd day of October, 2024.

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

AARON D. FORD  
Attorney General

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

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

*Attorney for Real Estate Division*