

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

DEC 30 2024

REAL ESTATE COMMISSION

BY Kelly Valaden

12 **OPPOSITION TO RESPONDENT'S REQUEST FOR
13 RECONSIDERATION OF PAYMENT PLAN**

14 The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY
15 OF THE STATE OF NEVADA ("Division"), by and through its attorneys of record, Aaron D. Ford,
16 Attorney General, and Christal P. Keegan, Deputy Attorney General, brings this Opposition to
17 Respondent's Request for Reconsideration of Repayment Plan.

18 DATED this 30th day of December 2024.

19 AARON D. FORD
20 Attorney General

21 By: epkeegan
22 CHRISTAL P. KEEGAN, ESQ.
23 Deputy Attorney General
24 Nevada Bar No. 12725
25 5420 Kietzke Lane, Suite 202
26 Reno, Nevada 89511
27 (775) 687-2141
28 ckeegan@ag.nv.gov

Attorney for Real Estate Division

1 **I. BACKGROUND**

2 At the November 19, 2024 Commission Hearing (the “Hearing”), the Commission unanimously
3 ordered Respondent William Francis Beaubien (“Broker Beaubien”) to pay an administrative fine in the
4 total amount of Four Thousand Four Hundred Eighty-Three Dollars and Sixty Cents (\$4,483.60) within
5 thirty (30) days from the Order, or by no later than January 27, 2025.¹ Despite Broker Beaubien being
6 present at his own hearing, why didn’t he inform the Commission right then and there that he needed
7 more than thirty (30) days to pay, or ask for a payment plan at that time?² Broker Beaubien certainly
8 could have, but he didn’t.

9 Instead, Broker Beaubien made his Request for a Payment Plan on November 22, 2024 comprised
10 of just five (5) sentences, on what he calls “outrageous fees” and because he “saw others get a payment
11 plan”.³ What was glaringly absent from Broker Beaubien’s request was any payment accompanying his
12 request, not even the \$250 he has been claiming to have been willing to pay the whole time.⁴ This appears
13 to be just another attempt by Broker Beaubien to avoid paying the Division.

14 Let’s not forget, the Division issued its Notice of Violation way back on or about June 7, 2024,
15 and since then the Respondent has dodged paying his administrative fine to the Division despite the
16 Division’s numerous warnings, certified letters, and emails.⁵ Let’s also not forget, by the time we get to
17 the February 11-13, 2025 Commission Hearings, Broker Beaubien will have managed to avoid paying
18 his fine for well over eight (8) months and he has himself to blame for this “living hell.”⁶

19 Therefore, the State opposes Broker Beaubien’s calling the fees “outrageous” as the record
20 reflects the Commissioners gave consideration and regard to the facts and circumstances in rendering the
21 fines within the timeframe imposed.⁷ The State opposes Broker Beaubien’s Request for a Repayment
22 Plan premised on a bandwagon effect, and otherwise fails to present any proof, cause or grounds which
23

24 ¹ Exhibit 1. Findings of Fact, Conclusions of Law and Order, Case No. 2024-521 Filed
November 27, 2024.

25 ² *Id.*, at P. 1, lines 14-15.

26 ³ Exhibit 2. Request for Payment Plan, Filed November 22, 2024.

27 ⁴ Exhibit 3. Helpful email from Commission Coordinator to Respondent Beaubien, November 27,
2024 4:10 PM.

28 ⁵ Exhibit 1. Order, November 27, 2024, Findings of Fact, P. 2.

⁶ Exhibit 4. Email from Respondent Beaubien November 22, 2024 2:29 PM re: NRED vs. William
Francis Beaubien, Case No. 2024-521, stating “Thanks for your assistance. NRED has made my life a
living hell. And I have only done one transaction ever and it was in 2020. What a mistake.”

⁷ Exhibit 1. Order, November 27, 2024.

1 entitle him to such relief.⁸ The State asks the Commission to stand by its lawful Order and to not further
2 delay payment to the Division.

3 **II. LEGAL ARGUMENT**

4 Nowhere in NRS 645 and NAC 645 does it mention the procedure for a reconsideration request.
5 According to Open Meeting Law under NRS 241, specifically NRS 241.020, prohibits the Commission
6 from taking action on matters not specifically listed on the public meeting agenda that have not
7 been formally included and properly noticed to the public beforehand. According to the Nevada
8 Administrative Procedures Act under NRS 233B, specifically NRS 233B.135(2), the burden of proof is
9 on the party attacking or resisting the decision to show that the final decision is invalid, and therefore, it
10 is Beaubien’s burden.

11 **A. Broker Beaubien’s Request Presents Zero Proof.**

12 Despite his burden of proof, Broker Beaubien does not include *any* repayment plan.⁹ Broker
13 Beaubien fails to provide *any* financial insights into his ability to pay the Total Amount due within
14 the thirty (30) days as ordered.¹⁰ Without proof of his ability to pay, Broker Beaubien asks the
15 Commission to make a determination that is arbitrary and capricious. Further, Broker Beaubien has
16 failed to present any plan to pay back the Total Amount due, and instead, imposes this task upon the
17 Commission, blindfolded.

18 Broker Beaubien’s request also fails because his case is distinguished from the other cases he
19 “saw got a payment plan.”¹¹ In the other cases, the Respondents received a payment plan as requested
20 as part of the settlement.¹² Let’s not forget that Broker Beaubien was offered settlement terms in good
21 faith but he decidedly chose to contest this case, and the Commission did not consider a payment plan as
22 part of its Order.¹³

23 ...

24 ...

26 ⁸ Exhibit 2. Request for Payment Plan, Filed November 22, 2024.

27 ⁹ Id.

¹⁰ Id.

28 ¹¹ Exhibit 4. Email in Response to Respondent Beaubien from Chief Compliance/Audit Investigator Jan Holle, November 22, 2024 at 3:27 PM.

¹² Id.

¹³ Id., and Exhibit 1. Order, November 27, 2024.

1 **B. Broker Beaubien’s Request to Vacate a Specific Portion of its Order Fails to Allege**
2 **any Cause or Grounds which Entitle him to a Reconsideration.**

3 Broker Beaubien’s Reconsideration Request does not allege nor demonstrate any causes or
4 grounds which would support reconsideration of the two (2) violations of law that the Division proved
5 by a preponderance of the evidence.¹⁴ Broker Beaubien does not make any claims of: (a) Irregularity in
6 the proceedings in the original hearing; (b) Accident or surprise which ordinary prudence could not have
7 guarded against; (c) Newly discovered evidence of a material nature which the applicant could not with
8 reasonable diligence have discovered and produced at the original hearing; or (d) Error in law occurring
9 at the hearing and objected to by the Respondent during the earlier hearing, that may otherwise entitle
10 him to a reconsideration.¹⁵

11 That is because Broker Beaubien cannot overcome the fact that the Total Amount Due within
12 thirty (30) days of the effective date, was reasonable, justified and properly ordered, therefore the
13 Commission should uphold its November 27, 2024 Order.¹⁶

14 **III. CONCLUSION**

15 The State respects the Commission’s discretion in this regard to reconsider a payment plan,
16 but it is important for the Commission to be informed before vacating a lawfully entered Order.
17 Importantly, Broker Beaubien has not argued that the thirty (30) days to pay his Total Amount Due was
18 erroneous or unlawful.¹⁷

19 Other than just saying so, Broker Beaubien’s request has not offered any proof that he “can not
20 pay the outrageous fees” within the 30 days.¹⁸ Nor has Broker Beaubien given any reason why this
21 Commission should grant his request for a repayment plan, other than he “saw others get
22 a payment plan” in cases that are totally distinguishable from his.¹⁹ The Commission should DENY
23 his request for a repayment plan because Broker Beaubien has given the Commission literally nothing
24 to consider.²⁰

25 ¹⁴ Exhibit 2. Request for Payment Plan, Filed November 22, 2024, and Exhibit 1. Order,
26 November 27, 2024.

26 ¹⁵ Exhibit 2. Request for Payment Plan, Filed November 22, 2024.

27 ¹⁶ Exhibit 1. Order, November 27, 2024, P. 3, lines 13-16, Order Term 1.

27 ¹⁷ Exhibit 2. Request for Payment Plan, Filed November 22, 2024.

28 ¹⁸ Id.

28 ¹⁹ Id., and Exhibit 4. Email in Response to Respondent Beaubien from Chief Compliance/Audit
Investigator Jan Holle, November 22, 2024 at 3:27 PM.

28 ²⁰ Exhibit 2. Request for Payment Plan, Filed November 22, 2024, in its entirety.

1 But should the Commission grant his reconsideration request, the Division respects the
2 Commission's discretion to do so, and for consideration of the Division's staff who are tasked
3 with monitoring and record keeping such accommodation to ensure Broker Beaubien's compliance.

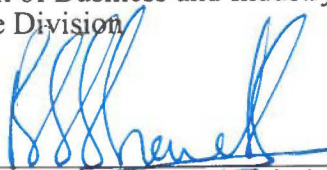
4 Thank you.

5
6 DATED this 30 day of December 2024.

DATED this 30th day of December 2024.

7 STATE OF NEVADA
8 Department of Business and Industry
9 Real Estate Division

AARON D. FORD
Attorney General

10 By: 
11 SHARATH CHANDRA, Administrator
12 CHARVEZ FOGER, Deputy Administrator
13 3300 West Sahara Avenue, Suite 350
14 Las Vegas, Nevada 89102

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

Attorney for Real Estate Division

EXHIBIT 1

EXHIBIT 1

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,

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8 vs.

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

11 Respondent.

Case No. 2024-521

FILED

NOV 27 2024

REAL ESTATE COMMISSION
BY 

12 **FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER**

13 This matter came on for hearing before the Real Estate Commission, Department of Business and
14 Industry, State of Nevada (the "Commission"), during a regular agenda set for a three-day stack
15 commencing November 19, 2024 (the "Hearing"). RESPONDENT William Francis Beaubien
16 ("RESPONDENT") appeared on his own behalf. Christal Park Keegan, Esq., Deputy Attorney General
17 with the Nevada Attorney General's Office, appeared on behalf of the Real Estate Division of the
18 Department of Business and Industry, State of Nevada (the "Division").

19 After hearing testimony presented in this matter, and careful consideration of all papers on file
20 herein, for good cause appearing, the Commission now enters its Findings of Fact, Conclusions of Law,
21 and Order against RESPONDENT as follows:

22 **JURISDICTION**

23 RESPONDENT, at all relevant times mentioned in this Complaint, was actively licensed as a
24 broker (B.1002427.INDV). RESPONDENT is, therefore, subject to the jurisdiction of the Division and
25 the Commission, and the provisions of NRS Chapter 645 and NAC Chapter 645.

26 **FINDINGS OF FACT**

27 The Commission, based on the evidence presented during the Hearing, by unanimous vote enters
28 the finding of the following facts:

RESPONDENT'S broker's license was first issued in April of 2020. *NRED 000003.*

1 In 2021, RESPONDENT timely submitted a completed 546A Form. *NRED 000004.*

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

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

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

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

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

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

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

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

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

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

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

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

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

28

1 **CONCLUSIONS OF LAW**

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

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

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

10 **ORDER**

11 The Commission, being fully apprised in the premises, and good cause appearing to the
12 Commission, unanimously ORDERS as follows:

13 1. Respondent shall pay an administrative fine to the Division in the total amount of Four
14 Thousand Four Hundred Eighty-Three Dollars and Sixty Cents (\$4,483.60) (“Amount Due”), which
15 includes the outstanding administrative fine of \$250 and \$4,233.60 for the Division’s costs and attorney’s
16 fees, within thirty (30) days from the effective date of this Order.

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

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

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4. This Order shall become effective thirty (30) days after the date of this Order.
Dated this 27th day of November, 2024.

NEVADA REAL ESTATE COMMISSION

By: 
President, Nevada Real Estate Commission

Dated this 21st day of November, 2024.

AARON D. FORD
Attorney General

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

Attorneys for Real Estate Division

**REAL ESTATE COMMISSION
ORDER ROUTING SLIP**

Case #: 2024-521

Respondent: William Francis Beaubien

Date:	Person to whom distributed:	Initials:
11-22-24	Approval & Signature to the President <u>Send Via Email / Request Email Back & Send Original in Mail</u>	SB
11-27-24	Print Hearing Cost Invoice <u>Send with Order</u>	SB
N/A	Copy to Respondent's Attorney (if applicable) <u>Send Via Certified Mail</u>	----
11-27-24	Copy to Respondent <u>Send Via Certified Mail</u>	SB
N/A	Copy to Respondent's Current Broker (If Applicable) <u>Send Via Regular Mail</u>	----
11-27-24	Original to Commission Electronic Case File	SB
11-27-24	Copy to Prosecuting Deputy Attorney General <u>Send Via Email</u> - Christal Keegan	KV
11-27-24	Copy to Compliance Section <u>Send Via Email to Chief</u>	KV
11-27-24	Copy to Licensing Manager (Only if Respondent is a Licensee) <u>Send Via Email</u>	KV
11-27-24	Copy to Education Information Manager <u>Send Via Email</u>	KV
11-27-24	Copy to Online Services Technician to place on Division website <u>Send Via Email</u>	KV
11-27-24	Copy to Fiscal Section. Email copy to BDHoward@business.nv.gov , ECervi@business.nv.gov , dana.embro@business.nv.gov , and the Department Fiscal general email bi-fiscalunit@business.nv.gov	KV
11-27-24	Add Fines and Costs into Licensing Section of SOAR.	KV
11-27-24	Update Enforcement Section Under Discipline with Action Items	KV
	Add Warning into Licensing Section of SOAR. <u>Done by Administration Section Manager</u>	
	Add to Disciplinary Report on the M: Drive. <u>Done by Administration Section Manager</u>	
11-27-24	Remove from Case Tracking Report	KV
11-27-24	Add to ARELLO Database if Respondent is Real Estate Licensee	KV
11-27-24	Add to LCB Report	KV
11-27-24	Scan, Rename & Save In Scanned Orders folder	KV

STATE OF NEVADA

JOE LOMBARDO
Governor



DR. KRISTOPHER SANCHEZ
Director

SHARATH CHANDRA
Administrator

CHARVEZ FOGER
Deputy Administrator

DEPARTMENT OF BUSINESS AND INDUSTRY
REAL ESTATE DIVISION

November 27, 2024

William Francis Beaubien
880 Northwood Boulevard #2
Incline Village, NV 89451

Certified Mail No.: 9589 0710 5270 0210 3400 85

RE: NRED vs. William Francis Beaubien
Case No: 2024-521

Enclosed you will find the Findings of Fact, Conclusions of Law and Order entered by the Nevada Real Estate Commission at the meeting held November 19, 2024. This is the fully executed copy for your records.

The Commission has ordered the following:

1. Respondent shall pay an administrative fine to the Division in the total amount of Four Thousand Four Hundred Eighty-Three Dollars and sixty Cents (\$4,483.60) ("Amount Due"), which includes the outstanding administrative fine of \$250 and \$4,233.60 for the Division's costs and attorney's fees, within thirty (30) days from the effective date of this Order.

Effective Date: December 27, 2024
Payment Due Date: January 27, 2025

Submit your payment to the address below. Checks or money orders are to be made payable to the "Nevada Real Estate Division".

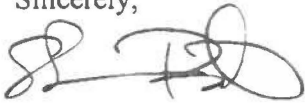
Nevada Real Estate Division
Administration Section
3300 West Sahara Avenue, Suite 350
Las Vegas, Nevada 89102

There are two copies of this letter enclosed, one copy is marked "Remittance Copy", and a copy should be returned with your check or money order to the Nevada Real Estate Division. The purpose of the remittance copy is to assure proper posting of fines to your disciplinary file.

Please note that the Division staff does not have the authority to extend the due date for your fine and/or costs which were ordered by the Commission. If you find that you are unable to meet the required due date, you will need to request in writing that you be placed on the agenda for a Commission hearing in which the Respondent will be allowed to request an extension from the Commission. This request should be made several months prior.

Please contact me if you have questions regarding this matter.

Sincerely,



Shareece Bates
Administration Section Manager
Telephone: (702) 486-4036
Email: sbates@red.nv.gov

Enclosures as indicated

cc: Sharath Chandra, Administrator
Christal P. Keegan, Deputy Attorney General
Education Section
Compliance Section
Fiscal

STATE OF NEVADA

JOE LOMBARDO
Governor



DR. KRISTOPHER SANCHEZ
Director

SHARATH CHANDRA
Administrator

CHARVEZ FOGER
Deputy Administrator

DEPARTMENT OF BUSINESS AND INDUSTRY
REAL ESTATE DIVISION

November 27, 2024

REMITTANCE COPY

William Francis Beaubien
880 Northwood Boulevard #2
Incline Village, NV 89451

Certified Mail No.: 9589 0710 5270 0210 3400 85

RE: NRED vs. William Francis Beaubien
Case No: 2024-521

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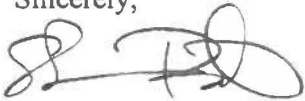
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Sincerely,



Shareece Bates
Administration Section Manager
Telephone: (702) 486-4036
Email: sbates@red.nv.gov

Enclosures as indicated

cc: Sharath Chandra, Administrator
Christal P. Keegan, Deputy Attorney General
Education Section
Compliance Section
Fiscal

JOE LOMBARDO
Governor

STATE OF NEVADA
REAL ESTATE COMMISSION

DARRELL PLUMMER
President
DONNA RUTHE
Vice-President
FORREST BARBEE
Secretary

Dr. Kristopher Sanchez
Director



DATE: 11/27/2024

RESPONDENT: William Francis Beaubien

CASE#: 2024-521

HEARING DATE: 11/19/2024

STATEMENT OF HEARING FEES AND COSTS PURSUANT TO NRS 622.400(2)

Administrative Costs: \$ 200.00

Investigative Costs: \$ 160.00

Commission Costs: \$ 143.90

Attorney Fees: \$ 3,729.70

Witness Costs: \$ -

Court Reporter Costs: \$ -

Other Services (Describe service below): \$ -

TOTAL AMOUNT DUE: \$ 4,233.60 *This does not include any fines or restitution ordered by the Commission

EXHIBIT 2

EXHIBIT 2

NOV 22 2024

Kelly Valadez

From: will@[REDACTED]
 Sent: Friday, November 22, 2024 2:50 PM
 To: Kelly Valadez
 Subject: Re: Submission of Prehearing Atty Fees RE Case# 2024-521 William Francis Beaubien

REAL ESTATE COMMISSION
 BY *Kelly Valadez*

Kelly,

I can not pay the outrageous fees that were given to me this week within 30 days as demanded. Jan Holle suggested I contact you. I saw others get a payment plan. How do I get on that program. Please do not add extra fees of asking this question.

Thanks,

Will Beaubien



Cal Broker 01437084
 Nevada Broker B.1002427

Mobile: 775-[REDACTED]
 e-mail: Will@[REDACTED]

On Nov 12, 2024, at 4:56 PM, Kelly Valadez <KValadez@red.nv.gov> wrote:

Good afternoon,

For your records, attached is the Submission of Pre-Hearing Attorney Fees Pursuant to NRS 622..400 and Brunzell Factors with Exhibits 1-2 filed with the Division on 11.12.24.

Please let me know if you have any questions.

Thank you,

Kelly Valadez

Commission Coordinator
 Nevada Real Estate Division
 3300 W. Sahara Avenue, Suite 350
 Las Vegas, Nevada 89102
 Office Hours: Monday-Thursday 7:00am to 6:00pm
 Phone: (702) 486-4606
 Fax: (702) 486-4275
www.red.nv.gov

<image001.jpg>

<Beaubien, William Francis 2024-521 Submission of Prehearing Atty Fees & EXH 1-2 Filed 11.12.24.pdf>

EXHIBIT 3

EXHIBIT 3

-----Original Message-----

From: Kelly Valadez

Sent: Wednesday, November 27, 2024 4:10 PM

To: will@[REDACTED]

Cc: Shareece N. Bates <sbates@red.nv.gov>

Subject: RE: Request for Payment Plan RE Case# 2024-521 William Francis Beaubien

Importance: High

Good afternoon, Mr. Beaubien,

I have been out of the office, so I apologize for my delayed response. Anytime you speak with me, there will be no cost or extra fees added.

For your records, I have attached the Cover Letter, Invoice, and Order that was mailed to your Incline Village address.

Also attached is your emailed request for a payment plan filed with the Division. Per your emailed request, I will place you on the agenda for the next Real Estate Commission meeting scheduled for February 11-13, 2025, to petition the Commission for a payment plan.

You should email me a proposed payment plan that is reasonable for your budget with a timeframe for repayment at your earliest convenience that can be included in the Commission's meeting packet for their consideration.

In the cover letter with your order, the payment due date is prior to the Commission meeting scheduled for February 11-13, 2025, when you would present your request for a payment plan.

It would show good faith to the Commission and your intentions of making timely payments if you made a payment prior to the due date in the cover letter, but that is completely at your discretion.

Please let me know if you have any further questions.

Wishing you a Happy Thanksgiving!

Kelly Valadez

Commission Coordinator

Nevada Real Estate Division

3300 W. Sahara Avenue, Suite 350
Las Vegas, Nevada 89102
Office Hours: Monday-Thursday 7:00am to 6:00pm
Phone: (702) 486-4606
Fax: (702) 486-4275
www.red.nv.gov

-----Original Message-----

From: [will \[REDACTED\]](#) <[will \[REDACTED\]](#)>
Sent: Friday, November 22, 2024 2:50 PM
To: Kelly Valadez <KValadez@red.nv.gov>
Subject: Re: Submission of Prehearing Atty Fees RE Case# 2024-521 William Francis Beaubien

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

EXHIBIT 4

EXHIBIT 4

From: will [REDACTED]
Sent: Friday, November 22, 2024 2:29 PM
To: Jan Holle <jholle@red.nv.gov>
Subject: Re: NRED vs. WILLIAM FRANCIS BEAUBIEN, CASE NO, 2024-521

Thanks for your assistance. NRED has made my life a living hell. And I have only done one transaction ever and it was in 2020. What a mistake.

Will Beaubien

[REDACTED]

Cal Broker 01437084
Nevada Broker B.1002427

Mobile: [REDACTED]
e-mail: [Will \[REDACTED\]](mailto:Will [REDACTED])

On Nov 22, 2024, at 3:27 PM, Jan Holle <jholle@red.nv.gov> wrote:

Hello Will – The others received a payment plan as they requested a payment plan as part of the settlement with the Division prior to the meeting. You were also offered a settlement prior to the meeting. However, you chose to contest the case, and the commission did not consider a payment plan as part of their Order.

I don't have anything to do with the Commission Orders, but I will try to assist you. I am not requiring anything from you. The Commission does ask me for a recommendation of discipline, but it is the Commission that ordered the fine and costs. If you would like the Commission to consider a payment plan for you, then you will need to contact Commission Coordinator, Kelly Valdez and request to be put on the February 2025 Commission Meeting Agenda for your payment plan request. You might also want to ask Kelly when the current amount is due and what happens if you don't pay on time. Kelly can be reached at kvaladez@red.nv.gov or (702) 486-4606. Take care.

Mr. Jan R. Holle
Chief Compliance/Audit Investigator
Department of Business & Industry
Nevada Real Estate Division
3300 W. Sahara Avenue, Suite 350
Las Vegas, NV 89102
Phone: 702-486-4326
Fax: 702-486-4275
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Disclaimer: I am not a lawyer and this should not be considered legal advice. You should seek appropriate counsel for your own situation.

From: will [REDACTED]

Sent: Friday, November 22, 2024 2:07 PM

To: Jan Holle <jholle@red.nv.gov>

Subject: Re: NRED vs. WILLIAM FRANCIS BEAUBIEN, CASE NO, 2024-521

Jan,

I will not be able to pay the outrageous amount of money you require in 30 days. I saw other people got a payment plan. How do I get on that program?

Also, can you please send all correspondence via e-mail since USPS mail is unreliable. I did just get the August letter you sent to me yesterday,

Thanks,

Will Beaubien



Cal Broker 01437084
Nevada Broker B.1002427

Mobile: [REDACTED]
e-mail: Will [REDACTED]

On Oct 8, 2024, at 2:37 PM, Jan Holle <jholle@red.nv.gov> wrote:

William – I did receive your voice messages regarding your request for documentation. As I informed you over the phone last week our legal counsel, Christal Keegan, is now handling this case on behalf of the Division. Please direct any document requests to Ms. Keegan. Thank you.

Sincerely,

Mr. Jan R. Holle
Chief Compliance/Audit Investigator
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