

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Petitioner,

vs.

AUBREY ANN SLACK,  
(S.0199109),

Respondent.

Case No. 2024-779

**FILED**

APR 10 2025

REAL ESTATE COMMISSION  
BY 

**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 AUBREY ANN SLACK ("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 NAC 645.806 (3), and the discipline to be imposed, if violations of law are proven.

**JURISDICTION**

RESPONDENT was at all relevant times mentioned in the Complaint licensed as a Salesperson under license number S.0199109 and is therefore subject to the jurisdiction of the Division and the Commission, and the provisions of NRS chapter 645 and NAC chapter 645.

**FACTUAL ALLEGATIONS**

1. At all times relevant to this Complaint, RESPONDENT has been a Nevada licensed Real Estate Salesperson, license number S.0199109, and employed with Realty One Group Inc., under the supervision of broker Mark Otero.<sup>1</sup>, since June 24, 2024. [NRED0001-0003].

<sup>1</sup> RESPONDENT ceased her association with Realty One as of December 5, 2024.

1           2.       RESPONDENT applied to reactivate her real estate license on June 24, 2024.  
2 [NRED0014-0016; 0002].

3           3.       On or about August 27, 2024, the Division received a statement of fact/complaint from  
4 Complainant Richard Dennis Slack, who alleged that his ex-wife, RESPONDENT, has failed to pay  
5 court-ordered child support for their son since "December 18, 2024" [sic- the actual date appears to be  
6 December 18, 2023]. [NRED0003-0006; NRED0009].

7           4.       The Complainant further alleged that RESPONDENT misrepresented herself in her  
8 application for Nevada real estate license reactivation, by misrepresenting that she was in compliance  
9 with her child support obligations. [NRED0006; 0015].

10          5.       On August 29, 2024, the Division issued an open investigation letter to RESPONDENT,  
11 with copy sent to her broker, Mark Otero, seeking response to the Complainant's allegations and any  
12 relevant documents in their possession. [NRED0017-0018].

13          6.       On September 30, 2024, RESPONDENT responded to the Division's open investigation  
14 letter with an affidavit form indicating that she was aware that she was required to disclose her child  
15 support order on her licensing re-activation application, that she believed she did disclose the information  
16 accurately and that if she did not, it was an unintentional oversight. [NRED0021-0023].

17          7.       RESPONDENT also claimed that she had been terminated from a prior employer in  
18 December of 2023 and, as a result of changing brokerages, had no income from December 2023 through  
19 September 27, 2024. [NRED0021-0023].

20          8.       Lastly, RESPONDENT claims she is working with DCSS in California to make current  
21 any past due payments. [NRED0021-0022].

22          9.       As of October 30, 2024, the Division did not receive any response or acknowledgment of  
23 the open investigation letter from RESPONDENT'S broker, Mark Otero, and sent broker Otero an email  
24 asking for responses/acknowledgments in the future. [NRED0024].

25          10.       On October 31, 2024, the Division sent a Notice of Violation letter to RESPONDENT at  
26 her business address of record, notifying her that the Division was imposing a \$500.00 fine pursuant to  
27 NAC 645.695 and advising her of her appeal rights if she disagreed with the finding of violation and/or  
28 imposition of the fine. [NRED0027-0035].

1           11.     On December 19, 2024, the Division Investigator sent RESPONDENT a NRS 233B letter  
2 via certified mail, informing RESPONDENT that due to her failure to pay the administrative fine, the  
3 Division intended to refer the matter for hearing before the Real Estate Commission. [NRED0036-0038]

4                                   **VIOLATIONS OF LAW**

5           RESPONDENT has committed the following violations of law:

6           1.           RESPONDENT violated NRS 645.633(1)(i) pursuant to NAC 645.605(11)(c) by  
7 engaging in deceitful and/or dishonest conduct when she misrepresented, in her June 2024 reactivation  
8 application, that she was in compliance with her child support obligations, when she, in fact, was not in  
9 compliance.

10                                  **DISCIPLINE AUTHORIZED**

11           Pursuant to NRS 645.630(g)(2), the Commission is empowered to impose an administrative fine  
12 of up to \$10,000 per violation and suspend, revoke, or place conditions on RESPONDENT'S license if  
13 warranted.

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

17           Therefore, the Division requests that the Commission take such disciplinary action as it deems  
18 appropriate under the circumstances.

19                                  **NOTICE OF HEARING**

20           **PLEASE TAKE NOTICE**, that a disciplinary hearing has been set to consider the  
21 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B and  
22 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada Administrative Code.

23           **THE HEARING WILL TAKE PLACE** on May 13, 2025, commencing at 9:00 a.m., or as  
24 soon thereafter as the Commission is able to hear the matter, and each day thereafter commencing  
25 at 9:00 a.m. through May 15, 2025, or earlier if the business of the Commission is concluded. The  
26 Commission meeting will be held at the Nevada State Business Center, 3300 W. Sahara Avenue,  
27 4th Floor – Nevada Room, Las Vegas, Nevada 89102 with video conferencing to the Nevada  
28 Division of Insurance, 1818 E. College Parkway, Suite 103, Carson City, Nevada 89706.

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 May 13, 2025  
3 through May 15, 2025, or earlier if the business of the Commission is concluded. Thus, your  
4 hearing may be continued until later in the day or from day to day. It is your responsibility to be  
5 present when your case is called. If you are not present when your hearing is called, a default may  
6 be entered against you and the Commission may decide the case as if all allegations in the complaint  
7 were true. If you have any questions, please call Shareece Bates, Administrative Section Manager,  
8 acting as Commission Coordinator at (702) 486-4036.

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.

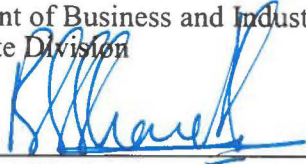
14       As the Respondent, you are specifically informed that you have the right to appear and be heard  
15 in your defense, either personally or through your counsel of choice. At the hearing, the Division has the  
16 burden of proving the allegations in the complaint and will call witnesses and present evidence against  
17 you. You have the right to respond and to present relevant evidence and argument on all issues involved.  
18 You have the right to call and examine witnesses, introduce exhibits, and cross-examine opposing  
19 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 NAC  
25 645 and if the allegations contained herein are substantially proven by the evidence presented and  
26 to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,  
27 pursuant to NRS 645.235, 645.633 and or 645.630.

28       DATED the 10 day of April, 2025.

State of Nevada  
Department of Business and Industry  
Real Estate Division

By:   
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