

1 acted as a Nevada-licensed real estate broker, as defined in NRS 645.030; as a salesperson
2 as defined in NRS 645.040, without the requisite license; and/or as a business broker permit
3 holder without the requisite permit pursuant to NRS 645.867, and is therefore subject to
4 the jurisdiction of the Division and the Commission, and the provisions of NRS chapter 645
5 and NAC chapter 645.

6 FINDINGS OF FACT

7 The Commission, based upon evidence presented during the Hearing, unanimously
8 voted in favor of entering the following findings of fact:

9 1. At all times relevant to this Complaint, RESPONDENT NEERU "NANCY"
10 SETH ("RESPONDENT") has not been licensed with, or otherwise held a permit issue by,
11 the Nevada Real Estate Division ("NRED" or the "Division").

12 2. Instead, RESPONDENT is a California licensed real estate broker, who, at
13 all times relevant to this complaint, operated a real estate agency, Priya International, Inc.,
14 where she maintained the email address "nancy@gasstationbroker.net."

15 3. On February 25, 2025, the Division received a Statement of Fact from
16 COMPLAINANTS Chai Lee and Choua Thao ("COMPLAINANTS"), owner representatives
17 of Cyclone Gasoline Enterprises, LLC, ("Cyclone") regarding the potential unlicensed
18 activity of RESPONDENT, in conducting a real estate transaction pertaining to Cyclone's
19 potential purchase and commercial lease of Art Investments LLC d/b/a PJ's Food & Gas
20 ("PJ's Food & Gas"), a gas station business with attached land located at 1455 Cornell Ave.,
21 Lovelock, Nevada, 89419.

22 4. COMPLAINANT contends, among other allegations, that RESPONDENT
23 used California Real Estate Forms to prepare a commercial lease for this Nevada-based
24 transaction and accepted commissions for the real estate transactions RESPONDENT
25 facilitated in Nevada.

26 5. COMPLAINANT also alleges that RESPONDENT enlisted, without
27 Complainants' knowledge or consent, We're Real Estate, a California real estate agency,
28

1 and Prithu Seth, an agent with We're Real Estate, to represent buyers in the originally
2 contemplated sales transaction.

3 6. On March 11, 2025, the Division issued an open investigation letter to
4 RESPONDENT at the address of Priya International, Inc., 244 W. Fairview Ave., #102,
5 Glendale, CA, regarding the Statement of Fact and attached documents, and requesting
6 her response via affidavit by March 26, 2025.

7 7. The March 11, 2025, letter was returned to the Division as undeliverable
8 and not capable of being forwarded.

9 8. On April 25, 2025, the Division re-issued the open investigation letter to
10 RESPONDENT at a second address, 6765 Vanderbilt St., Chino, CA, and requesting her
11 response via affidavit by May 9, 2025.

12 9. On May 5, 2025, RESPONDENT sent the Division her response via the
13 affidavit form and attached documents pertaining to the original anticipated sale
14 transaction, as well as the consummated lease transaction, of PJ's Food & Gas.

15 10. In her response, RESPONDENT stated that she informed all parties to the
16 transaction, including the buyers, seller, escrow company and bank, that she did not have
17 a Nevada license and would be doing the paperwork for the lease on California Association
18 of Realtors ("C.A.R.") real estate forms.

19 11. RESPONDENT further stated that she was paid pursuant to a consulting
20 agreement with the seller for the work she performed in the transaction.

21 12. Among the documents she prepared for the PJ's Food & Gas transaction,
22 primarily, but not exclusively, on C.A.R.-issued forms, included:

- 23 a. Disclosure Regarding Real Estate Agency Relationship;
- 24 b. Commercial Lease Agreement;
- 25 c. Management Agreement;
- 26 d. Business Purchase Agreement and Joint Escrow Instructions;
- 27 e. Landlord's Waiver; and
- 28 f. At least eight (8) addenda and contingency removal documents.

1 4. The Commission retains jurisdiction for correcting any errors that may
2 have occurred in the drafting and issuance of this document.

3 5. This Order shall be deemed effective as of the date it is signed, below.

4 DATED this 30th day of April, 2026.

5 REAL ESTATE COMMISSION
6 STATE OF NEVADA

7 By: Donna A. Ruthe
8 DONNA A. RUTHE, Commission President

9
10 Submitted by:
11 AARON D. FORD
Attorney General

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