

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Case No. 2025-171

Petitioner,

FILED

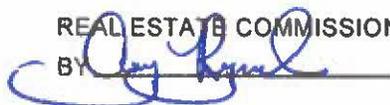
vs.

JAN 09 2026

NEERU SETH,

REAL ESTATE COMMISSION

Respondent.

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 NEERU SETH ("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 NRS 645.235 and/or NRS 622.400, and the discipline to be imposed, if violations of law are proven.

JURISDICTION

RESPONDENT, at all relevant times pertinent to the violations in this Complaint, acted as a Nevada-licensed real estate broker, as defined in NRS 645.030; as a salesperson as defined in NRS 645.040, without the requisite license; and/or as a business broker permit holder without the requisite permit pursuant to NRS 645.867, 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
2 1. At all times relevant to this Complaint, RESPONDENT NEERU "NANCY"
3 SETH ("RESPONDENT") has not been licensed with, or otherwise held a permit issue by,
4 the Nevada Real Estate Division ("NRED" or the "Division"). [NRED0053-0056].

5 2. Instead, RESPONDENT is a California licensed real estate broker, who, at all
6 times relevant to this complaint, operated a real estate agency, Priya International, Inc.,
7 where she maintained the email address "nancy@gasstationbroker.net." [NRED0063; 0218-
8 0232].

9 3. On February 25, 2025, the Division received a Statement of Fact from
10 COMPLAINANTS Chai Lee and Choua Thao ("COMPLAINANTS"), owner representatives
11 of Cyclone Gasoline Enterprises, LLC, ("Cyclone") regarding the potential unlicensed
12 activity of RESPONDENT, in conducting a real estate transaction pertaining to Cyclone's
13 potential purchase and commercial lease of Art Investments LLC d/b/a PJ's Food & Gas
14 ("PJ's Food & Gas"), a gas station business with attached land located at 1455 Cornell Ave.,
15 Lovelock, Nevada, 89419. [NRED0001-0010; 032-0043; 0218-0232].

16 4. COMPLAINANT contends, among other allegations, that RESPONDENT
17 used California Real Estate Forms to prepare a commercial lease for this Nevada-based
18 transaction and accepted commissions for the real estate transactions RESPONDENT
19 facilitated in Nevada. [NRED0002-0006; 0218-0232].

20 5. COMPLAINANT also alleges that RESPONDENT enlisted, without
21 Complainants' knowledge or consent, We're Real Estate, a California real estate agency,
22 and Prithu Seth, an agent with We're Real Estate, to represent buyers in the originally
23 contemplated sales transaction. [NRED0218-0232].

24 6. On March 11, 2025, the Division issued an open investigation letter to
25 RESPONDENT at the address of Priya International, Inc., 244 W. Fairview Ave., #102,
26 Glendale, CA, regarding the Statement of Fact and attached documents, and requesting
27 her response via affidavit by March 26, 2025. [NRED0064-0065].

28 7. The March 11, 2025, letter was returned to the Division as undeliverable and

1 not capable of being forwarded. [NRED0066].

2 8. On April 25, 2025, the Division re-issued the open investigation letter to
3 RESPONDENT at a second address, 6765 Vanderbilt St., Chino, CA, and requesting her
4 response via affidavit by May 9, 2025. [NRED0067-0069].

5 9. On May 5, 2025, RESPONDENT sent the Division her response via the
6 affidavit form and attached documents pertaining to the original anticipated sale
7 transaction, as well as the consummated lease transaction, of PJ's Food & Gas.
8 [NRED0072-0079; 0080-0232].

9 10. In her response, RESPONDENT stated that she informed all parties to the
10 transaction, including the buyers, seller, escrow company and bank, that she did not have
11 a Nevada license and would be doing the paperwork for the lease on California Association
12 of Realtors ("C.A.R.") real estate forms. [NRED0076-0079].

13 11. RESPONDENT further stated that she was paid pursuant to a consulting
14 agreement with the seller for the work she performed in the transaction. [NRED0076].

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

- 17 a. Disclosure Regarding Real Estate Agency Relationship;
- 18 b. Commercial Lease Agreement;
- 19 c. Management Agreement;
- 20 d. Business Purchase Agreement and Joint Escrow Instructions;
- 21 e. Landlord's Waiver; and
- 22 f. At least eight (8) addenda and contingency removal documents.

23 [NRED0080-0217].

24 13. The transaction was subsequently the subject of a settlement demand and/or
25 litigation, as memorialized in a January 13, 2025, Settlement Demand Letter addressed
26 to Art Investments LLC and Priya International from Sierra Crest Law Group on behalf of
27 Cyclone. [NRED0218-0232].

28 14. On October 29, 2025, the Division mailed an NRS 233B letter via certified

1 mail to RESPONDENT, stating the Division's intent to file a complaint with the
2 Commission for violations of NRS 645.230.1. [NRED0070-0072].

3 VIOLATIONS OF LAW

4 RESPONDENT has committed the following violations of law:

5 1. RESPONDENT violated NRS 645.230(1)(a) pursuant to NRS 645.235(1) by
6 willfully and knowingly acting in the capacity of a real estate broker and/or salesperson, as
7 defined by NRS 645.030 and NRS 645.040, respectively, when she performed activities
8 pertaining to the commercial lease of PJ's Food & Gas for which a license is required under
9 NRS 645, without first holding the requisite license.

10 2. RESPONDENT violated NRS 645.867 and NRS 645.230(d) pursuant to
11 NRS 645.235(1), by willfully and knowingly acting in the capacity of a real estate business
12 broker without first holding the requisite business broker permit.

13 3. RESPONDENT violated NRS 645.235(1)(a) pursuant to NRS 645.235(1) by
14 willfully and/or knowingly engaging in activities for which a license is required under NRS
15 645 without holding any such license, from which she earned \$249,000.00 in commissions.

16 DISCIPLINE AUTHORIZED

17 Pursuant to NRS 645.235(2), the Commission is empowered to impose an
18 administrative fine not to exceed the amount of any gain or economic benefit that the
19 person derived from the violation or \$5,000, whichever amount is greater.

20 Additionally, under NRS Chapter 622, the Commission is authorized to impose costs
21 of the proceeding upon RESPONDENT, including investigative costs and attorney's fees, if
22 the Commission otherwise imposes discipline on RESPONDENT.

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

25 NOTICE OF HEARING

26 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider the
27 Administrative Complaint against the above-named Respondent in accordance with
28

1 Chapters 233B and 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada
2 Administrative Code.

3 **THE HEARING WILL TAKE PLACE on February 10, 2026, commencing at**
4 **9:00 a.m., or as soon thereafter as the Commission is able to hear the matter, and**
5 **each day thereafter commencing at 9:00 a.m. through February 12, 2026, or**
6 **earlier if the business of the Commission is concluded. The Commission meeting**
7 **will be held at the Nevada State Business Center, 3300 West Sahara Avenue, 4th**
8 **Floor, Nevada Room, Las Vegas, Nevada 89102, with video conference to the**
9 **Nevada Division of Insurance, 1818 College Parkway, Suite 103, Carson City,**
10 **Nevada 89706.**

11 **STACKED CALENDAR: Your hearing is one of several hearings scheduled**
12 **at the same time as part of a regular meeting of the Commission that is expected**
13 **to last from February 10, 2026, through February 12, 2026, or earlier if the**
14 **business of the Commission is concluded. Thus, your hearing may be continued**
15 **until later in the day or from day to day. It is your responsibility to be present**
16 **when your case is called. If you are not present when your hearing is called, a**
17 **default may be entered against you, and the Commission may decide the case as**
18 **if all allegations in the complaint were true. If you have any questions, please**
19 **call Amy Reveyrand, Commission Coordinator, at (702) 486-4606.**

20 **YOUR RIGHTS AT THE HEARING: except as mentioned below, the hearing is an**
21 **open meeting under Nevada's open meeting law and may be attended by the public. After**
22 **the evidence and arguments, the commission may conduct a closed meeting to discuss your**
23 **alleged misconduct or professional competence. You are entitled to a copy of the transcript**
24 **of the open and closed portions of the meeting, although you must pay for the transcription.**

25 **As the Respondent, you are specifically informed that you have the right to appear**
26 **and be heard in your defense, either personally or through your counsel of choice. At the**
27 **hearing, the Division has the burden of proving the allegations in the complaint and will**
28 **call witnesses and present evidence against you. You have the right to respond and to**

1 present relevant evidence and argument on all issues involved. You have the right to call
2 and examine witnesses, introduce exhibits, and cross-examine opposing witnesses on any
3 matter relevant to the issues involved.

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

9 The purpose of the hearing is to determine if the Respondent has violated NRS 645
10 and/or NAC 645 and if the allegations contained herein are substantially proven by
11 the evidence presented and to further determine what administrative penalty is to be
12 assessed against the RESPONDENT, if any, pursuant to NRS 645.235, 645.633 and or
13 645.630.

14 DATED the 9th day of January, 2026.

15 State of Nevada
16 Department of Business and Industry
17 Real Estate Division

18 By: 

19 Charvez Foger, Deputy Administrator
20 3300 West Sahara Avenue, Suite 350
21 Las Vegas, Nevada 89102

22 AARON D. FORD
23 Attorney General

24 By: /s/ Phil W. Su

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