BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

SHARATH CHANDRA, Administrator, REAL ESTATE DIVISION, DEPARTMENT OF BUSINESS AND INDUSTRY, STATE OF NEVADA, Petitioner, vs. WAYNE TANG, (S.0172416 - SUSPENDED, PM.0165609 - INACTIVE), Respondent.	Case No. 2022-100 FILED OCT 3 1 2024 REAL ESTATE COMMISSION BY Kelley Valadez

OPPOSITION TO RESPONDENT'S REQUEST FOR RECONSIDERATION OF DISCIPLINE

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

DATED this 31st day of October 2024.

AARON D. FORD
Attorney General

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

Attorney for Real Estate Division

I. BACKGROUND

In jogging our memories since the nearly one-and-a-half years this case was heard before the Nevada Real Estate Commission ("Commission"),[1] this case is about the Respondent Wayne Tang ("Tang") failing his duties as a real estate licensee and engaging in deceitful, fraudulent or dishonest acts in furtherance of his contemplated interest in the property located at 4909 El Este Lane, North Las Vegas, Nevada.[2] Therefore, by unanimous vote, the Commission ordered Tang to pay a Total Amount of $28,496.34 due by December 5, 2023.[3]

Tang had six (6) months to pay the Total Amount due, but paid only $8,496.34 by the due date.[4] Accordingly, the Commission's default provision Order Term No. 3 resulted in suspension of Tang's salesperson license.[5] While Tang represented to the Division to have "paid $8,000 on October 22, 2024", the payment was not mailed until October 28, 2024, and not received by the Division until October 31, 2024.[6] To date, Tang has failed to pay the remaining amount of $12,000.[7]

So, the question presents itself: Why is this request coming just now, when Tang had an extensive amount of time to comply with the Order and numerous opportunities to mitigate his default since the Commission entered its Order on May 5, 2023?[8]

What Tang has not told the Commission is the situation prevailing after the May 2023 Commission Hearings allege Tang began blackmailing the State's witness's family to pay the $28,496.34 by threatening to release sensitive information he gained as a real estate licensee from the transaction

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[1] Exhibit 1. Nevada Real Estate Commission Minutes, May 2, 2023.

[2] Exhibit 2. Findings of Fact, Conclusions of Law and Order, Case No. 2022-100, Filed May 5, 2023 ("Order").

[3] *Id.*

[4] Exhibit 3. NRED Payment Receipt.

[5] Exhibit 2. Order. P. 4, lines 9-15, *Order Term No 3. "If the Amount Due is not received by the Division on or before its due date, it shall be a default by the RESPONDENT. In the event of default, any licenses held by RESPONDENT from the Division shall be immediately suspended, and the unpaid balance of the administrative fine and costs, together with any attorney's fees and costs that may have been assessed, shall be due in full to the Division within ten (10) calendar days of the date of default, and the Division may obtain a judgment for the amount owed, including collection fees and costs."* Exhibit 4. License Status.

[6] Exhibit 5. Reconsideration of Discipline – Wayne Tang S.172416, Filed October 22, 2024. Exhibit 3. NRED Payment Receipt.

[7] Exhibit 3. NRED Payment Receipt.

[8] Commission held five (5) Meetings following the May 2-4, 2023 Commission Meetings where Tang could have made this request, on (1) August 22-24, 2023, (2) November 7-9, 2023, (3) February 20-22, 2024, (4) May 14-16, 2024, and (5) August 13-15, 2024 (Carson City).

paperwork he handled.[9] That is an aggravating factor for this Commission to consider in this request. Upon learning of Tang's recent request for reconsideration, the witness has indicated fear that if the Commission does not reduce his fine, he would come after her family again.[10]

The administration of justice cannot be intimidated by Tang's tactics. It is necessary that the Division file this Opposition to ensure the Commission is adequately informed. We will be asking the Commission to standby its lawful Order.

II. LEGAL ARGUMENT

Nowhere in NRS 645 and NAC 645 does it mention the procedure for a reconsideration request. Therefore, we turn to the Nevada Administrative Procedures act under NRS 233B for guidance, specifically NRS 233B.130, in relevant part under subsection 4 scantly addresses the timeliness of such requests:

> **NRS 233B.130 Judicial review; requirements for petition and cross-petition; statement of intent to participate; petition for rehearing or reconsideration; service; dismissal of certain agencies and persons from proceedings concerning final decision of State Contractors' Board; exclusive means.**
> 4. A petition for rehearing or reconsideration must be filed within 15 days after the date of service of the final decision. An order granting or denying the petition must be served on all parties at least 5 days before the expiration of the time for filing the petition for judicial review. If the petition is granted, the subsequent order shall be deemed the final order for the purpose of judicial review.

Pursuant to NRS 233B.135(2), the burden of proof is on the party attacking or resisting the decision to show that the final decision is invalid, and therefore it is Tang's burden.

A. Tang's Request for Reconsideration Should be DISMISSED Because it is Time-Barred.

Pursuant to NRS 233B.130(4), Tang's reconsideration request is untimely. The May 5, 2023 Order was the final decision, and the Order was served upon Tang on May 8, 2023 at 3:21 p.m. to his agent at his North Las Vegas address.[11] Therefore, Tang should have filed his Petition 15 days from that date, or by May 23, 2023.

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[9] Exhibit 7. Emails from State's Witness. May 22, 2023 10:12 PM.
[10] Exhibit 7. Emails from State's Witness. October 29, 2024, 9:22:08 AM.
[11] Exhibit 6. USPS Tracking Results.

Instead of 15 days as required, Tang comes now nearly 533 days[12] later with his reconsideration request.[13] Further, Tang has not reasonably explained why he waited approximately 322 days[14] after his Payment Due Date to bring this request.[15]

B. Tang's Request Fails his Burden of Proof and Should be DISMISSED.

Despite his burden of proof, Tang does not include any repayment plan.[16] Tang has further failed to provide *any* financial insights into his ability to pay.[17] Tang's request provides zero proof of income; he has not provided any documentation to support his claim that his sole source of income is from Uber.[18] Tang has provided nothing in the way of substantiating his inability to make good on the Commission's Order: he did not provide any paystubs, tax returns, W-2s or other wage statements, bank statements, investment account statements, and any other verification letters, leases, benefits, compensation or insurance.[19]

Without proof of his ability to pay, Tang asks the Commission to make a determination that is arbitrary and capricious. Further, Tang has failed to present any plan to pay back the Total Amount due, and instead, dumps that task upon the Commission, blindfolded.[20]

C. Tang's Request to Vacate a Specific Portion of its Order Fails to Allege any Cause or Grounds which Entitle him to a Reconsideration and Should be DISMISSED.

Tang's Reconsideration of Discipline does not allege nor demonstrate any causes or grounds which would support reconsideration of the five (5) violations of law that the Division proved by a preponderance of the evidence.[21] Despite it being his burden of proof, Tang does not make any claims of: (a) Irregularity in the proceedings in the original hearing; (b) Accident or surprise which ordinary

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[12] Calculated from date of service on May 8, 2023 to his Reconsideration of Discipline Request filed October 22, 2024.

[13] Exhibit 5. Reconsideration of Discipline – Wayne Tang S.172416, Filed October 22, 2024, in its entirety.

[14] Calculated from Payment Due Date on December 5, 2023 to his Reconsideration of Discipline Request filed October 22, 2024.

[15] Exhibit 5. Reconsideration of Discipline – Wayne Tang S.172416, Filed October 22, 2024, in its entirety.

[16] *Id.*

[17] *Id.*

[18] *Id.*

[19] *Id.*

[20] *Id.*

[21] *Id.*

prudence could not have guarded against; (c) Newly discovered evidence of a material nature which the applicant could not with reasonable diligence have discovered and produced at the original hearing; or (d) Error in law occurring at the hearing and objected to by the applicant during the earlier hearing.[22]

That is because Tang cannot overcome the fact that the Total Amount due, within an extremely generous amount of time of six (6) months of the effective date, was properly ordered, therefore the Commission should uphold its May 5, 2023 Order.[23]

III. CONCLUSION

Based on the foregoing, the Division respectfully respects the Commission follow the law and *DISMISS* Tang's Request for Reconsideration of Discipline because it is time-barred per NRS 233B.130(4). The Commission did not deny Tang the ability to file for reconsideration 15 days from receipt of the May 5, 2023 Order, and therefore his untimely request is unreasonable. While the inclusion of this request on the Commission's docket is a deviation from the law's exclusion of untimely requests,[24] the Commission, in accordance with the law, should *AFFIRM* its May 5, 2023 Order.

The State respects the Commission's discretion in these regards to reconsider a payment plan, but it is very important for the Commission to be informed before vacating a lawfully entered Order. Particularly when Tang's request fails to argue that the Total Amount Due was erroneous or unlawful.

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[22] *Id.* NAC 645.820(7).
[23] Exhibit 2. Order.
[24] Exhibit 8. Meeting Notice.

We are reminded with due regard the paramount interests of the public must be safeguarded. Tang has not presented any reason that this Commission should abrogate the significance of its Order on May 5, 2023, and doing so erodes the safeguards in the interests of the public. Thank you.

DATED this 31 day of October 2024.

STATE OF NEVADA
Department of Business and Industry
Real Estate Division

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

DATED this 31st day of October 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
Attorney for Real Estate Division

EXHIBIT 1

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NEVADA REAL ESTATE COMMISSION
MINUTES

IN PERSON AND VIRTUAL VIA WEBEX

May 2, 2023

Nevada State Business Center
3300 W. Sahara Avenue
4th Floor – Nevada Room
Las Vegas, Nevada 89102

The meeting was called to order at 9:08 AM

1-A) Introduction of Commissioners in Attendance
David Tina, Clark County; Lee Gurr, Elko County; Darrell Plummer, Washoe County; Russell Roth, Clark County; and Donna A. Ruthe, Clark County.

Commission Counsel: Chief Deputy Attorney General Rosalie Bordelove

1-B) Swearing in of Newly Appointed Commissioner
Commissioner Donna A. Ruthe was sworn in.

1-C) Introduction of Division Staff in Attendance
Sharath Chandra, Administrator; Charvez Foger, Deputy Administrator; Shareece Bates, Administration Section Manager; Kelly Valadez, Commissioner Coordinator; Maria Gallo, Commission Coordinator; Jan Holle, Chief Compliance Audit Investigator and staff; Annalyn Carrillo, Education and Information Officer; Deputy Attorney Generals Phil Su, Christal Keegan, Matthew Feeley, and Louis Csoka representing the Division.

2) Public Comment
No public comment.

3-A) Discussion Regarding the Administrator's Report.
Sharath Chandra present this report. Mr. Chandra stated that the Legislature is currently in session and the budget for the Real Estate Division was discussed with one addition of increasing the Northern investigator position from part time to full time being approved, but the request to add a Northern licensing position was not approved. Mr. Chandra stated that the Division is following the draft bills AB52, AB62, AB309, AB340, AB392, SB335, SB368, SB378, SB381, and SB417 that are relevant to the Division and Commission.

Mr. Chandra stated that after eight months of working with the company implementing the Division's new technology, there has been minimal progress because of multiple personnel changes within the technology company's team working on the Division's project. Mr. Chandra stated that with the licensing requirements and multiple layers of other sections within the Real Estate Division being added into the technology, the technology company underestimated the

complexity of what was needed despite many discussions with the Division. Mr. Chandra stated that options are being considered to help meet the Division's timeline and deadlines.

3-B) Discussion Regarding the Disciplinary Report.
Shareece Bates presented this report. Ms. Bates provided the Commission with a written report.

3-C) Discussion Regarding the Compliance Section's Current Caseload Report, Including a Summary of Recent Topics of Complaints Filed.
Jan Holle presented this report. Mr. Holle provided the Commission with a written report and summarized.

3-D) Discussion Regarding the Administrative Sanction Report.
Jan Holle presented this report. Mr. Holle provided the Commission with a written report and summarized.

3-E) Discussion Regarding Continuing Education Supervisor's Reports.
Annalyn Carrillo presented this report. Ms. Carrillo provided the Commission with a written report and summarized.

3-F) For Possible Action: Discussion and Decision to Approve Minutes of the February 21-23, 2023 meeting.
Commissioner Gurr moved to approve the minutes of the February 21-23, 2023, meeting. Seconded by Commissioner Roth. Motion carried 4-1 with Commissioner Ruthe abstaining because she was not part of the Commission during the February 21-23, 2023 meeting.

3-G) For Possible Action: Discussion and Decision on Date, Time, Place, and Agenda Items for Upcoming Meetings.
- August 22-24, 2023
- The Commission will be in Carson City

4-A) For Possible Action: Discussion and Decision Regarding the Instructor Denial Appeal Pursuant to NAC 645.426.
Parties Present
Hung Yeh was present.
Annalyn Carrillo, Education and Information Officer, was present for the Division.

Ms. Carrillo stated that Mr. Yeh is here because NAC 645.426 states that any instructor applicant that has had prior discipline or administrative fines must appear before the Commission for approval. Ms. Carrillo stated that Mr. Yeh received an administrative fine of $1,000.00 for failing to submit trust account reconciliations in case number 2019-474. Ms. Carrillo reported that the fine has been paid and the case is closed. Ms. Carrillo stated that Mr. Yeh also had case number 2019-472 where the Commission ordered him to pay the total amount of $5,162.19 and complete 9 hours of continuing education. Ms. Carrillo reported that the fine has been paid, the continuing education has been completed, and the case is closed.

Mr. Yeh stated that he had temporarily helped someone manage a property and he was at fault for not opening a trust account, but he paid the fine and has learned from his mistake. Mr. Yeh stated that his application to be an instructor should not be denied because education is good for the public, he is doing the public and his fellow real estate agents a favor by sharing his knowledge, and the classes do not pertain to money. Mr. Yeh stated that real estate is his passion, and he has a lot of experience and knowledge to share.

The Commission questioned Mr. Yeh.

The Commission questioned Ms. Carrillo.

Commissioner Plummer moved to grant the appeal and approve Mr. Yeh as an instructor. Seconded by Commissioner Ruthe. Motion carried.

5-A) For Possible Action: Discussion and Decision Regarding Respondent's Petition for Reconsideration of Disciplinary Terms.
NRED v Jamel Ramzi
Case No. 2021-277

Parties Present
Jamel Ramzi was present.
Matthew Feeley, Deputy Attorney General, was present representing the Division.

Mr. Ramzi stated that two or three years ago there were allegations brought against him where he accepted an Alford plea. Mr. Ramzi stated that during his previous appearance before the Commission, it was determined that he would be fined and that his real estate license would be suspended during the probation period of his civil case. Mr. Ramzi stated that he has completed his probation and would like to have his license reinstated. Mr. Ramzi stated that he has not been able to work for the past two years and did not have the ability to pay the fine that was assessed by the Commission. Mr. Ramzi stated that he was an award-winning salesperson with no complaints, and he is asking for reconsideration to have his real estate license reinstated and receive a payment plan so he can get back to work and begin paying the fine.

Mr. Feeley stated that the Division objects to Mr. Ramzi's petition for reconsideration. Mr. Feeley stated that the Commission's order filed on October 6, 2021, ordered Mr. Ramzi to pay $3,842.26 within 6 months and that Mr. Ramzi would have to appear before the Commission to have his license reinstated after his probation period ended relating to his civil case. Mr. Feeley stated that Mr. Ramzi's probation period ended on February 17, 2023, but Mr. Ramzi has not paid any money toward the fine that was ordered, and therefore the Division cannot support Mr. Ramzi's request.

The Commission questioned Mr. Ramzi.

Commissioner Gurr moved in the matter of NRED v Jamel Ramzi case# 2021-277 that the respondent receive a payment plan of not less than $400.00 a month toward the total amount of fines and costs of $3,842.26 that were ordered in this case, and that the first payment is due

within 30 days of the effective date of the order. Seconded by Commissioner Plummer. Motion carried.

Commissioner Plummer moved for case# 2021-277 that the respondent's request to have his license reactivated be denied until the fine and costs are paid in full. Seconded by Commissioner Ruthe.

Commissioner Plummer stated that he would like to amend his motion to include that once confirmation of payment in full has been made, Division staff can activate the license without the respondent appearing before the Commission provided that all other licensing requirements are met. Seconded by Commissioner Ruthe. Motion carried.

6-A) For Possible Action: Discussion and Decision Regarding Respondent's Petition for Rehearing of Disciplinary Action.
NRED v Thelma Franco-Young
Case No. 2018-377

Parties Present
Thelma Franco-Young was present.
Louis Csoka, Senior Deputy Attorney General was present representing the Division.

Ms. Franco-Young stated that she is requesting a rehearing because she did not receive notice of the complaint and that is why she was not present during the hearing.

Mr. Csoka stated that a default judgement was entered during the February 21-23, 2023, Commission meeting because the respondent failed to appear. Mr. Csoka stated that for the default order to be removed, the respondent would need to demonstrate excusable neglect.

Commissioner Gurr stated that this case dealt with property management and trust account violations, and she is disinclined to grant this rehearing unless the respondent is willing to surrender her license and property management permit until the case is heard.

Commissioner Plummer stated that for the Commission to have moved forward with a default, it would have been proven that proper service was provided.

Ms. Franco-Young stated that she was in the hospital around that time and did not receive the notice of the hearing. Ms. Franco-Young stated that the first notice that she received was the notice of default.

State's Witness
Kelly Valadez, Commission Coordinator, testified regarding service of complaint.

Commissioner Plummer moved for case# 2018-377 to approve the respondent's request for a rehearing. Seconded by Commissioner Roth. Motion carried 4-1 with Commissioner Ruthe opposed.

7-F) NRED v Marshall Carrasco, for possible action
Case # 2022-120

Commissioner Tina stated that this case has been continued.

7-G) NRED v Marshall Carrasco, for possible action
Case # 2021-1122

Commissioner Tina stated that this case has been continued.

7-J) NRED v Tod Wever, for possible action
Case # 2021-715

Commissioner Tina stated that this case has been continued.

7-M) NRED v Frank Gary Villani, for possible action
Case # 2022-677

Commissioner Tina stated that this case has been continued.

7-B) NRED v Chi-Hsu Yu, for possible action
Case # 2021-966

Parties Present

Chi-Hsu Yu was not present.
Bob Peterson, Esq. was present representing Mr. Yu.
Christal Keegan Deputy Attorney General, was present representing the Division.

Preliminary Matters

Ms. Keegan stated that a settlement had been reached. Ms. Keegan read the factual allegations, alleged violations, and settlement into the record.

Settlement

- RESPONDENT agrees to pay the Division a total amount of $23,682.00 ("Amount Due"), consisting of a $20,000.00 fine imposed by the Division, the Division's pre-hearing costs and fees in the amount of $1,400.00, and the Attorney's pre-hearing costs and fees in the amount of $2,282.00 within 48-months.
- The Amount Due shall be payable to the Division as follows:
  RESPONDENT shall pay the Division's and Attorney's pre-hearing costs and fees within thirty (30) days after approval of this Stipulation by the Commission ($3,682.00), with monthly payments to start sixty (60) days after approval of this Stipulation by the Commission, as follows:

  1st Year: 12 payments at $300/month
  2nd Year: 12 payments at $400/month
  3rd Year: 12 payments at $500/month
  4th Year: 11 payments at $500/month

  With $100 on the 12th and final payment in the 4th year for a total payment of $23,682.00, as being the total Amount Due hereunder. At any time, RESPONDENT may elect to make pre-payments on the Amount Due with no penalties so long as the monthly amount due in the annual period is satisfied in full as specified above.

- RESPONDENT further agrees to voluntarily surrender his property management permit, and shall not reapply for 10 years, with such reapplication subject to appearance before the Real Estate Commission for approval of any licensure prior to obtaining licensure.

Commissioner Gurr moved in the matter of the NRED v Chi-Hsu Yu Case# 2021-966 that the stipulation and order for settlement of disciplinary action be accepted. Seconded by Commissioner Roth.

Commissioner Ruthe stated that she is opposed to the respondent still having a real estate license.

Commissioner Plummer stated that he is concerned with the respondent still being active with his license.

Motion failed 2-3 with Commissioners Ruthe, Plummer, and Tina opposed.

Commissioner Plummer moved in the matter of NRED v Chi-Hsu Yu case# 2021-966 that the stipulation for settlement be rejected. Seconded by Commissioner Ruthe.

Commissioner Gurr stated that cases with stipulations for settlement have had thorough investigations and been through discussions and negotiations that the Commission does not delve into because it is not a hearing, and she will be voting in opposition to this motion.

Motion failed 2-3 with Commissioners Gurr, Roth, and Tina opposed.

Commissioner Gurr moved in the matter of NRED v Chi-Hsu Yu case# 2021-966 to accept the stipulation as presented. Seconded by Commissioner Roth.

Commissioner Roth stated that a lot of work went into working out the settlement and it does not show faith in our legal staff if the Commission is going to overrule them with limited information.

Commissioner Ruthe stated that this is a serious matter, and the respondent should have been present today even though he has legal counsel. Commissioner Ruthe stated that having been in the real estate field for 42 years, it is important to protect the public and she is not saying that the Division's legal counsel did not reach the best settlement possible, but she disagrees with having someone still out there doing business with a license after hearing the allegations that were read into the record.

President Plummer stated that there is a lot of time that goes into reaching a settlement, but just because a settlement has been reached it does not mean that the Commission will simply move to approve because the parties agree. Commissioner Plummer stated that he would like to know if taking the license was considered in settlement negotiations.

Ms. Bordelove stated that settlement information can only be shared if both parties agree because if the settlement is rejected, the case would go to hearing where settlement discussions are not admissible.

Mr. Peterson stated that he wanted to share with the Commission that all clients were made whole despite any of the discrepancies alleged. Mr. Peterson stated that his client has a Chinese name that is difficult to pronounce, and it has been discussed with his client that he cannot go by Charles on a contract.

Commissioner Gurr stated that she has friends and clients that are from Asia and sometimes licenses are issued in a different name than a birth certificate might indicate because immigration records support that.

Commissioner Ruthe stated that she understands the name confusion, but the license should be suspended for a certain period because there were more issues than just the name.

Motion failed 2-3 with Commissioners Ruthe, Plummer, and Tina opposed.

Commissioner Plummer moved in the matter of NRED v Chi-Hsu Yu case# 2021-966 to accept the stipulation as presented. Seconded by Commission Gurr. Motion carried 3-2 with Commissioners Ruthe and Tina opposed.

7-C) NRED v Sean Marshall, for possible action
Case # 2021-818

Parties Present
Sean Marshall was not present.
Donna DiMaggio, Esq. was present representing Mr. Marshall.
Christal Keegan, Deputy Attorney General, was present representing the Division.

Preliminary Matters
Ms. Keegan stated that a settlement had been reached. Ms. Keegan read the factual allegation, alleged violations, and settlement into the record.

Settlement

- RESPONDENT agrees to pay the Division a total amount of $4,130.00 ("Amount Due"), consisting of a $2,000 fine imposed by the Division, the Division's pre-hearing costs and fees in the amount of $500, and the Attorney's pre-hearing costs and fees in the amount of $1,630.
- The Amount Due shall be payable to the Division in full within thirty (30) days after approval of this Stipulation by the Commission.

Ms. DiMaggio stated that Mr. Marshall agreed to the settlement.

Commissioner Plummer moved in the matter of the NRED v Sean Marshall case# 2021-818 that the stipulation for settlement of disciplinary action be approved. Seconded by Commissioner Ruthe. Motion carried.

7-D) NRED v Fred Glick, for possible action
Case # 2021-819

Fred Glick was not present.
Donna DiMaggio, Esq. was present representing Mr. Glick.
Christal Keegan, Deputy Attorney General, was present representing the Division.

Preliminary Matters
Ms. Keegan stated that a settlement had been reached. Ms. Keegan read the factual allegation, alleged violations, and settlement into the record.

Settlement

- RESPONDENT agrees to pay the Division a total amount of $4,570.00 ("Amount Due"), consisting of a $2,500 fine imposed by the Division, the Division's pre-hearing costs and fees in the amount of $440, and the Attorney's pre-hearing costs and fees in the amount of $1,630.
- The Amount Due shall be payable to the Division in full within thirty (30) days after approval of this Stipulation by the Commission.

Ms. DiMaggio stated that Mr. Glick agrees to the settlement.

Commissioner Ruthe moved in the matter of the NRED v Fred Glick case# 2021-819 that the stipulation for settlement of disciplinary action be accepted. Seconded by Commissioner Gurr. Motion carried.

7-E) NRED v Tyler Scott Richardson, for possible action
Case # 2022-119

Parties Present
Tyler Scott Richardson was present.
Christal Keegan, Deputy Attorney General, was present representing the Division.

Preliminary Matters
Ms. Keegan stated that a settlement had been reached. Ms. Keegan read the factual allegation, alleged violations, and settlement into the record.

Settlement

- RESPONDENT agrees to pay the Division a total amount of $9,707.00 ("Amount Due"), consisting of a $7,000.00 fine imposed by the Division, the Division's pre-hearing costs and fees in the amount of $425.00, and the Attorney's pre-hearing costs and fees in the amount of $2,282.00 within 48-months.
- The amount Due shall be payable to the Division as follows:
  RESPONDENT shall pay $200 a month, with monthly payments to start sixty (60) days after approval of this Stipulation by the Commission, as follows:
  1st Year: 12 payments at $200/month
  2nd Year: 12 payments at $200/month
  3rd Year: 12 payments at $200/month
  4th Year: 11 payments at $200/month

With $307 to be paid on the 12th and final payment in the 4th year for a total payment of $9,707.00, as being the total Amount Due hereunder. At any time, RESPONDENT may elect to make pre-payments on the Amount Due with no penalties so long as the monthly amount due in the annual period is satisfied in full as specified above.

- RESPONDENT further agrees to complete a total of 30 hours of live continuing education in the relevant areas of six (6) hours of agency, six (6) hours of law and legislation, six (6) hours of contracts, six (6) hours of ethics, and six (6) hours risk reduction, which shall not be counted towards his license renewal requirements. RESPONDENT shall complete the education set forth herein within 120 days from the date of the Order approving this Stipulation.

Commissioner Gurr moved in the matter of NRED v Tyler Scott Richardson case# 2022-119 to accept the stipulation for settlement as presented. Seconded by Commissioner Roth. Motion carried.

7-K) NRED v George L. Anderson, III, for possible action
Case # 2021-32
7-L) NRED v George L. Anderson, III, for possible action
Case # 2021-1228

Parties Present
George L. Anderson III was not present.
Lisa Rasmussen, Esq. was present representing Mr. Anderson.
Phil Su, Senior Deputy Attorney General, was present representing the Division.

Preliminary Matters
Mr. Su stated that a global settlement for both cases had been reached. Mr. Su read the factual allegation, alleged violations, and settlement into the record for both cases.

Global Settlement

- RESPONDENT agrees to pay the Division a total amount of TWENTY-FIVE THOUSAND DOLLARS ($25,000.00) ("Amount Due"), consisting of an $11,000.00 administrative fine imposed by the Division and the Division's pre-hearing costs and attorney's fees in the total amount of $14,000.00.
- The Amount Due shall be payable to the Division within one year of the Effective Date of the order approving this settlement, according to the following payment schedule: an initial payment of THREE THOUSAND DOLLARS ($3,000.00) is payable within thirty days from the effective date of this order, followed by eleven (11) monthly payments of TWO THOUSAND DOLLARS ($2,000.00). Lump sums can be made in pre-payment with no penalty so long as the monthly amount payments timely satisfied in full as specified above.
- RESPONDENT shall voluntarily surrender the broker license issued to him by the Division (B.1001398.LLC and B.1001399.INDV) and, for a period of five years from the Effective Date of the order approving this settlement, agrees not to reapply for a broker license in this State.
- If RESPONDENT elects to apply for a real estate salesperson license in this State during the reapplication restriction period, RESPONDENT agrees to appear before the Commission for consideration and final approval of such application.

Ms. Rasmussen stated that Mr. Anderson agreed to the stipulation.

Commissioner Plummer moved in the matter of the NRED v George L. Anderson, III case# 2021-32 and case# 2021-1228 that the global stipulation for settlement of disciplinary action be accepted as presented. Seconded by Commissioner Roth. Motion carried.

7-I) NRED v Ronald M. Powell, for possible action
Case # 2020-401

Parties Present
Ronald Powell was not present.
Louis Csoka, Senior Deputy Attorney General, was present representing the Division.

Preliminary Matters
Mr. Csoka stated that continued settlement negotiations are ongoing with the respondent because there is a predicate step being resolved relative to the titling of a mobile home that is sitting on the parcel which is taking a significant amount of time. Mr. Csoka stated that this case is close to being resolved but another continuance is being requested.

Commissioner Gurr asked if Mr. Powell had an active license.

Mr. Csoka stated that Mr. Powell is not licensed.

Commissioner Tina stated that this case will be continued.

7-A) NRED v Emigdio Martinez-Pineda, for possible action
Case # 2020-544

Parties Present
Emigdio Martinez-Pineda was not present.
Louis Csoka, Senior Deputy Attorney General, was present representing the Division.

State's Witness
Kelly Valadez, Commission Coordinator, testified regarding service of meeting notice.

Preliminary Matters
Mr. Csoka stated that Mr. Martinez-Pineda appeared virtually for the February 21-23, 2023 meetings when the hearing began and when the meetings adjourned, the State had rested their case. Mr. Csoka stated that Mr. Martinez-Pineda was aware that his case would be continued to the May 2-4, 2023 meetings and based on Mr. Martinez-Pineda not being in attendance to present his case, the State is requesting that a default be entered.

Commissioner Plummer moved pursuant to NAC 645.860 that the State has proven sufficient service of notice to the respondent for case# 2020-544. Seconded by Commissioner Gurr. Motion carried.

Mr. Csoka read the factual allegations and violations of law into the record.

Commissioner Plummer moved in case# 2020-544 that the factual allegations and violations of law were proven. Seconded by Commissioner Gurr. Motion carried.

Division's Recommendation for Discipline
Jan Holle presented this:

- $70,000 fine plus the costs of the hearing and investigation in the amount of $12,296.70 to be paid within 90 days of the effective date of the order.
- Revocation of all licenses and permits.

Commissioner Plummer moved in case# 2020-544 that the respondent pay a fine in the amount of $70,000.00 plus the costs of the hearing and investigation fees in the amount of $12,296.70 to be paid within 90 days of the effective date of the order, and that all licenses and permits are revoked. Seconded by Commissioner Gurr. Motion carried.

7-H) NRED v Wayne Tang, for possible action
Case # 2022-100

Parties Present
Wayne Tang was present.
Christal Keegan, Deputy Attorney General, was present representing the Division.

Opening Statements
Ms. Keegan gave her opening statement.
Mr. Tang gave his opening statement.

State's Witness
Maria Martin testified.

Ms. Keegan asked that the State's exhibits BS 000001-000128 be admitted.

Commissioner Tina stated that the documents would be admitted.

Mr. Tang had no questions for Ms. Martin.

The Commission had no questions for Ms. Martin.

The witness was dismissed.

Mr. Tang asked for his exhibits 1-6 to be admitted.

Ms. Keegan stated that she objects to Ta-Chung Poe's affidavit in the respondent's exhibits because there are authentication issues with the signature not matching, an irregularity contained on the notary's certificate, and that Mr. Poe is not in attendance to testify, and he has had competency issues with dementia long before the execution of this affidavit. Ms. Keegan stated that Mr. Poe's affidavit lacks foundation and objects to it being admitted.

Mr. Tang stated that the affidavit was signed at the American Institute which is Consular from the United States to Taipei with a special notary and seal of the United States Embassy. Mr. Tang stated that the United States Embassy would not allow someone to sign in front of them if it was not that person.

Commissioner Tina stated that the objection is overruled but asks the Commission take into consideration how and where it is presented because Mr. Poe is not here to testify in person.

Commissioner Tina stated that the respondent's exhibits 1-6 are admitted.

Mr. Tang stated his case.

Ms. Keegan cross-examined Mr. Tang.

Respondent's Witness
Cynthia Lujan testified.

Ms. Keegan cross-examined Ms. Lujan.

The Commission questioned Ms. Lujan.

The witness was dismissed.

Mr. Tang asked for exhibit of LLC holdings to be admitted.

Commissioner Tina stated that the exhibit would be admitted.

Respondent's Witness
Jean Poe testified.

Ms. Keegan cross-examined Ms. Poe.

The Commission had no questions for Ms. Poe.

The witness was dismissed.

Closing Statements
Ms. Keegan gave her closing statement.
Mr. Tang gave his closing statement.

Factual Allegations
Commissioner Gurr moved that factual allegation 1 has been proven. Seconded by Commissioner Plummer. Motion carried.

Commissioner Gurr moved those factual allegations 2-3 have been proven. Seconded by Commissioner Plummer. Motion carried.

Commissioner Gurr moved that factual allegation 4 has been proven. Seconded by Commissioner Plummer. Motion carried.

Commissioner Plummer moved those factual allegations 5-8 have been proven. Seconded by Commissioner Ruthe. Motion carried.

Commissioner Plummer moved those factual allegations 9-11 have been proven. Seconded by Commissioner Ruthe. Motion carried.

Commissioner Gurr stated that she did not realize that factual allegation 8 was included in the previous motion and she would like to change her vote to nay.

Commissioner Tina stated that allegation 8 is still proven 4-1 with Commissioner Gurr opposed.

Commissioner Roth moved that factual allegation 12 has been proven. Seconded by Commissioner Gurr. Motion carried.

Commissioner Gurr moved those factual allegations 13-16 have been proven. Seconded by Commissioner Ruthe. Motion carried.

Commissioner Gurr moved that factual allegation 17 has not been proven. Seconded by Commissioner Roth. Motion carried 4-1 with Commissioner Ruthe opposed.

Violations of Law

Commissioner Plummer moved that violation of law 1 has been proven. Seconded by Commissioner Gurr. Motion carried.

Commissioner Gurr moved those violations of law 2-3 have been proven. Seconded by Commissioner Plummer. Motion carried.

Commissioner Plummer moved those violations of law 4-5 have been proven. Seconded by Commissioner Roth. Motion carried.

Division's Recommendation for Discipline

Jan Holle presented this:

- $25,000 fine plus the costs of the hearing and investigation in the amount of $3,496.34 to be paid within 6 months of the effective date of the order.
- 18 hours of live continuing education to be completed within 90 days of the effective date of the order in the following areas:
  - 6 hours in agency
  - 6 hours in ethics
  - 3 hours in law and legislative
  - 3 hours in contracts

Commissioner Plummer moved for case# 2022-100 that the respondent pay a fine of $25,000.00 plus the costs of the hearing and investigation in the amount of $3,496.34 within 6 months of the effective date of the order, and that the respondent take 18 hours of live continuing education

with 6 hours in agency, 6 hours in ethics, 3 hours in law and legislative, and 3 hours in contracts to be completed within 90 days of the effective date of the order. Seconded by Commissioner Ruthe. Motion carried.

8) Public Comment
No public comment.

9) For Possible Action: Adjournment
Meeting recessed at 3:33 p.m. on May 2, 2023.

Prepared by: Kelly Valadez

EXHIBIT 2

EXHIBIT 2

JOE LOMBARDO
Governor

STATE OF NEVADA

TERRY REYNOLDS
Director

SHARATH CHANDRA
Administrator

CHAREZ FOGER
Deputy Administrator

DEPARTMENT OF BUSINESS AND INDUSTRY
REAL ESTATE DIVISION
www red.nv.gov

May 5, 2023

Wayne Tang
514 Rio Largo Way
N. Las Vegas, NV 89031

Certified Mail No.: 7022 2410 0000 4871 3946

Wayne Tang
c/o 24 Karat Realty
4055 Spencer Street
Suite 226
Las Vegas, NV 89119

Certified Mail No.: 7022 2410 0000 4871 3953

RE: NRED v Wayne Tang
Case No: 2022-100

Enclosed you will find the Findings of Fact, Conclusions of Law, and Order entered by the Nevada Real Estate Commission at the meeting held May 2, 2023. 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 $28,496.34 ("Amount Due"), which includes a fine of $25,000 for violations of law and $3,496.34 for the Division's costs and attorney's fees, within six (6) months from the effective date of this Order.

2. RESPONDENT further shall complete a total of 18 hours of live, continuing education in the relevant areas of six (6) hours of agency, six (6) hours of ethics, (3) hours of law and legislation, and three (3) hours in contracts, which shall not be counted towards his license renewal requirements. RESPONDENT shall complete the education set forth herein within 90 days from the date of the Order.

Effective Date of Order: June 5, 2023
Payment Due Date: December 5, 2023
Education Due Date: September 4, 2023

NOTE: Your fine and/or cost of hearing totals $10,000.00 or more. Please be aware that pursuant to NRS 353.1467 your payment must now be made electronically. For details on how to submit your electronic payment, please see Informational Bulletin #016 (included) or contact the Department of Business and Industry's Management Analyst Grace Hilgar-Devito at 702-486-5134 or email at ghilgar@ business.nv.gov.

Please note that the Division staff does not have the authority to extend the due date for your fine or education 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.

Sincerely,

Kelly Valadez

Kelly Valadez
Commission Coordinator
Telephone: (702) 486-4606
Email: kvaladez@red.nv.gov

Enclosures as indicated

cc: Sharath Chandra, Administrator
Christal Keegan, Deputy Attorney General
Ethan Allen Grant III, Broker, via regular mail
Licensing Section
Education Section
Compliance Section
Fiscal

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Petitioner,

vs.

WAYNE TANG, (S.0172416, PM.0165609)

Respondent.

Case No. 2022-100

FILED

MAY 05 2023

REAL ESTATE COMMISSION

BY Kelly Valadez

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

This matter came on for hearing before the Real Estate Commission, Department of Business and Industry, State of Nevada (the "Commission"), during a regular agenda set for a three-day stack commencing May 2, 2023 (the "Hearing"). RESPONDENT Wayne Tang ("RESPONDENT") appeared on his own behalf. Christal Park Keegan, Esq., Deputy Attorney General with the Nevada Attorney General's Office, appeared on behalf of the Real Estate Division of the Department of Business and Industry, State of Nevada (the "Division"). After hearing testimony presented in this matter and for good cause appearing, the Commission now enters its Findings of Fact, Conclusions of Law, and Order against RESPONDENT as follows:

JURISDICTION

RESPONDENT, at all relevant times mentioned in this Complaint, was actively licensed as a Salesperson under license number S.0172416, and Property Manager under permit number PM.0165609. RESPONDENT is, therefore, subject to the jurisdiction of the Division and the Commission, and the provisions of NRS chapter 645 and NAC chapter 645.

FINDINGS OF FACT

The Commission, based on the evidence presented during the Hearing and the vote that carried, enters the finding of the following facts:

///

At all times relevant to this Complaint, RESPONDENT was the buyer's agent for the real property located at 4909 El Este Lane, North Las Vegas, Nevada (the "Property"). *NRED 000018 – 000027.*

On or about January 26, 2022, RESPONDENT presented a Residential Purchase Agreement ("RPA") for the buyer on the Property. *NRED 000018 – 000027.*

The RPA's financial terms and conditions provided for a $10,000 deposit earnest money deposit ("EMD") wired into open escrow. *NRED 000018.*

On February 10, 2022, the buyer emailed RESPONDENT that she had reservations about moving forward with purchasing the Property. *NRED 000054.*

To keep his buyer in the deal, RESPONDENT emailed his buyer an Agreement between RESPONDENT and his buyer regarding the Property ("Agreement"). *NRED 000055 – 000056.*

The Agreement's terms provided RESPONDENT would lend all the money and fees for his buyer to purchase the Property, and in return, RESPONDENT would purchase the Property at the original purchased price within three months after closing. *NRED 000056.*

There is no evidence the buyer agreed to the Agreement. *NRED 000056.*

Yet, on February 11, 2022, RESPONDENT transferred the EMD amount directly to his buyer without authorization. *NRED 000059 – 000060.*

On the same day, following RESPONDENT's transfer of the unauthorized EMD, RESPONDENT changed his mind, and emailed his buyer that he decided not to buy the Property through her because he did not trust her. *NRED 000059 – 000060.*

In the February 11, 2022 email, RESPONDENT acknowledged his buyer hoped RESPONDENT would get his commission, and his response to that was: "I don't give a shit about commission or you going to pay me." *NRED 000059 – 000060.*

RESPONDENT knew his buyer didn't want to proceed with the purchase of the Property. *NRED 000059 – 000060.*

As such, RESPONDENT requested his buyer return his unauthorized EMD wired funds back to him, and in return RESPONDENT would provide buyer with the requested cancellation instructions for the Property. *NRED 000059.*

On February 11, 2022, not RESPONDENT himself, but RESPONDENT'S Broker ("Complainant"), successfully obtained cancelation of the purchase for the property. *NRED 000014.*

RESPONDENT was terminated from the brokerage that same day. *NRED 000064 - 000069.*

Upon Complainant's review of RESPONDENT'S Property transaction file, she discovered documents were not included in the file that should have been included in RESPONDENT'S file. *NRED 000011.*

There is no evidence that a Duties Owed was ever presented. *NRED 000011.*

CONCLUSIONS OF LAW

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

1. RESPONDENT violated NAC 645.650(2) for failing to timely provide his broker with the paperwork related to the transaction.

2. RESPONDENT violated NRS 645.633(1)(h) pursuant to NAC 645.605(4) for failing to disclose, in writing, his interest or contemplated interest in the Property.

3. RESPONDENT violated NRS 645.633(1)(i) for engaging in deceitful, fraudulent and or dishonest dealings by attempting to get a potential buyer to make a loan and purchase the above-mentioned property for him.

4. RESPONDENT violated NRS 645.252(2) by failing to exercise reasonable skill and care with all parties when he wired the EMD to his buyer.

5. RESPONDENT violated NRS 645.252(3) by failing to provide the Duties Owed to his client.

ORDER

The Commission, being fully apprised in the premises, and good cause appearing to the Commission, by unanimous vote, ORDERS as follows:

1. RESPONDENT shall pay an administrative fine to the Division in the total amount of $28,496.34 ("Amount Due"), which includes a fine of $25,000 for violations of law and $3,496.34 for the Division's costs and attorney's fees, within six (6) months from the effective date of this Order.

2. RESPONDENT further shall complete a total of 18 hours of live, continuing education in the relevant areas of six (6) hours of agency, six (6) hours of ethics, (3) hours of law and legislation, and three (3) hours in contracts, which shall not be counted towards his license renewal requirements. RESPONDENT shall complete the education set forth herein within 90 days from the date of the Order.

3. If the Amount Due is not received by the Division on or before its due date, it shall be a default by the RESPONDENT. In the event of default, any licenses held by RESPONDENT from the Division shall be immediately suspended, and the unpaid balance of the administrative fine and costs, together with any attorney's fees and costs that may have been assessed, shall be due in full to the Division within ten (10) calendar days of the date of default, and the Division may obtain a judgment for the amount owed, including collection fees and costs.

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

5. This Order shall become effective on the 5th day of June, 2023.

Dated this 5th day of May, 2023

NEVADA REAL ESTATE COMMISSION

By: David Tina
Vice President, Nevada Real Estate Commission

Dated this 4th day of May, 2023

AARON D. FORD
Attorney General

By: ckeegan
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

EXHIBIT 3

EXHIBIT 3

KCC

Nevada Department of Business and Industry
Real Estate Division

Payment Receipt

Transaction Date : 08/30/2023
Receipt # : 688338
Receipt Identification : WAYNE TANG

Cashier : MAIL-Kelly Valadez

Money Tendered

Type	Amount	Reference	Payer Name	Payment Comment
Check	$8,496.34	1033	WAYNE TANG	CASE 2022-100
Total :	$8,496.34			

Distribution

License	Use	Amount	Fee Desc	Business Name	Paid From	Paid To	BY
S.0172416	----	8,496.34	RE COMMISSION FINES (EXCL. HEARING COSTS)	WAYNE TANG	12/01/2022	11/30/2024	MAIL-Kelly Valadez

The following licenses have fees due or credit amounts available.
S.0172416 $20,000.00 Fees Due

Close

9.6.23

Nevada Department of Business and Industry
Real Estate Division

Payment Receipt

Transaction Date : 10/31/2024 **Cashier :** MAIL-Kelly Valadez

Receipt # : 732170

Receipt Identification : WAYNE TANG

Money Tendered

Type	Amount	Reference	Payer Name	Payment Comment
Check	$8,000.00	1056	WAYNE USA, LLC	WAYNE TANG CASE# 2022-100
Total :	$8,000.00			

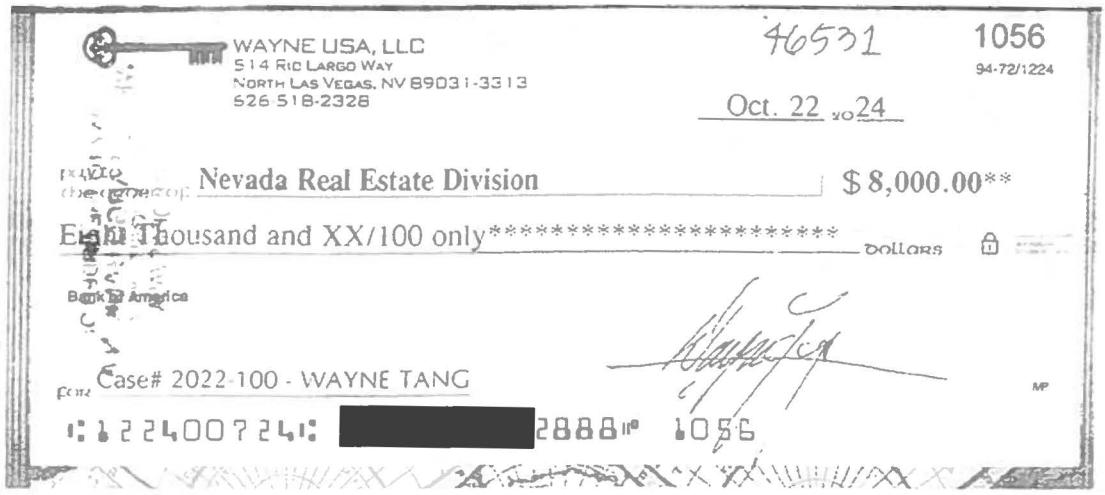
Distribution

License	Use	Amount	Fee Desc	Business Name	Paid From	Paid To	BY
S.0172416	-----	8,000.00	RE COMMISSION FINES (EXCL. HEARING COSTS)	WAYNE TANG	12/01/2024	11/30/2026	MAIL-Kelly Valadez

The following licenses have fees due or credit amounts available.

S.0172416 $12,000.00 Fees Due

Print Close



WAYNE USA, LLC
514 Rio Largo Way
North Las Vegas, NV 89031-3313
626 518-2328

46531

1056
94-72/1224

Oct. 22 20 24

Pay to the order of Nevada Real Estate Division $ 8,000.00**

Eight Thousand and XX/100 only********** dollars

Bank of America

For Case# 2022-100 - WAYNE TANG

⑆122400724⑆ [redacted] 2888⑈ 1056

Wayne Tang
514 Rio Largo Way
North Las Vegas, NV 89031-3313

LAS VEGAS NV 890
28 OCT 2024 PM 5 L



Nevada Real Estate Division
3300 W. Sahara Ave., Suite 350
Las Vegas, NV 89102

89102-320375

EXHIBIT 4

EXHIBIT 4

	Name	License Number	License Type	License Status	City	State	Zip Code
Detail	WAYNE TANG	172416	SALESPERSON	SUSPENDED	N LAS VEGAS	NV	89031
Detail	WAYNE TANG	165609	PROPERTY MANAGER	INACTIVE	N LAS VEGAS	NV	89031

Search for a License

Search Criteria

Note Hover over any field to display help text.

License Number

Company Name/DBA:

First Name:

wayne

Last Name:

tang

Maiden Name:

City:

State:

Zip:

County:

Select a State

Please note that this code is case sensitive

(../Controls/FormShield.aspx?__formShieldID=FormShield1&generate=sound&properties=77E59E534FD71DABCADCF9569F93C46403CCD6703385AE77D12B9631E6B1C92C5DCC13C8EFC3A2A5

1. Enter Code* 37A47N

Current Filters

Submit Clear Form

Last Name: tang
First Name: wayne

More Online Services

NO LOGIN REQUIRED

Lic

	Name	License Number	License Type	License Status	City	State	Zip Code
Detail	WAYNE TANG	172416	SALESPERSON	SUSPENDED	N LAS VEGAS	NV	89031
Detail	WAYNE TANG	165609	PROPERTY MANAGER	INACTIVE	N LAS VEGAS	NV	89031

About Us

The mission of the Nevada Real Estate Division is to protect the public and Nevada's real estate sectors by fairly and effectively regulating real estate professionals through licensure, registration, education and enforcement.

Contact Us

Find us at:
Nevada Real Estate Division
3300 W. Sahara Avenue, Suite 350
Las Vegas, NV 89102

Send mail to:
Nevada Real Estate Division
3300 W. Sahara Avenue, Suite 350
Las Vegas, NV 89102

realest@red.nv.gov
(702) 486-4033

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EXHIBIT 5

EXHIBIT 5

FILED

OCT 2 2 2024

REAL ESTATE COMMISSION

BY

From: [redacted]
To: Shareece N. Bates
Subject: Reconsideration of Discipline - Wayne Tang S.172416
Date: Tuesday, October 22, 2024 3:39:53 PM
Importance: High

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

Hi Shareece,

Please find following request from me to the Commission,

To Real Estate Commission of Discipline:

My name is WAYNE TANG, license no. S.0172416. Case No. 2022-100
My total fine for the violation is $28,496.34
I've paid $8,496.34 on Aug. 31, 2023
I've paid $8,000 on Oct. 22, 2024

I would like to appear in front of the Commission to have the Commissioners to reconsider my case for the fine amount and also a payment plan.

The real estate market has been slow I haven't have any sales for the past two years and trying to pay the fine by driving Uber. Uber business is bad too due to the inflation of the economy. I paid $8,000 on Oct. 22, 2024 is from the money I made from Uber from 2024. I just have a new listing in Sep. 2024. Right after I listed the property MLS 2617910 I realized that my license was suspended. Now my listing is on hold.

I would like have the Commission to reconsider my discipline terms, thank you!

Regards,
Wayne Tang
S.0172416

EXHIBIT 6

EXHIBIT 6

USPS Tracking®

FAQs >

Remove X

Tracking Number:

70222410000048713946

Copy Add to Informed Delivery (https://informeddelivery.usps.com/)

Latest Update

Your item has been delivered to an agent for final delivery in NORTH LAS VEGAS, NV 89031 on May 8, 2023 at 3:21 pm.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered to Agent

Delivered to Agent for Final Delivery

NORTH LAS VEGAS, NV 89031
May 8, 2023, 3:21 pm

See All Tracking History

What Do USPS Tracking Statuses Mean? (https://faq.usps.com/s/article/Where-is-my-package)

Feedback

Text & Email Updates

USPS Tracking Plus®

Product Information

See Less ^

Remove X

Tracking Number:

70222410000048713953

Copy **Add to Informed Delivery (https://informeddelivery.usps.com/)**

Latest Update

Your package is moving within the USPS network and is on track to be delivered to its final destination. It is currently in transit to the next facility.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Moving Through Network

In Transit to Next Facility
June 10, 2023

Unclaimed/Being Returned to Sender
LAS VEGAS, NV 89119
June 2, 2023, 10:52 am

See All Tracking History

What Do USPS Tracking Statuses Mean? **(https://faq.usps.com/s/article/Where-is-my-package)**

See More ⌄

Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

FAQs

EXHIBIT 7

EXHIBIT 7

From: [redacted]
To: Christal P. Keegan
Subject: Re: Wayne Tang Case No. 2022-100/Rehearing Nov. 19-21, 2024 RE: Recommendation/ Advice
Date: Tuesday, October 29, 2024 9:22:08 AM

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

Hi Christal,

Thanks for reaching back out. I hope all has been well with you since we were last in touch.

Back in 2023, Mr. Tang did attempt to blackmail my father over the course of several months. He threatened to report false claims to the IRS about my mother and my father separately. He flew to Taipei, where my father lives, and spread terrible rumors about my father and me. He wrote my father many messages about how he has all my information and won't hesitate to use it against me. As far as I know, there has been no further contact with Mr. Tang in 2024 although I have not asked my father about it recently.

Regarding Mr. Tang's petition, I do not have further information and I do not plan to attend the hearing. I would actually prefer that Mr. Tang be granted the reduction in his disciplinary term so that he has some financial relief, and will not be tempted to come after my family again. I do not wish to pursue anything against him as I want him to leave us alone.

Thank you very much.
Kind Regards,
[redacted]

> On Oct 28, 2024, at 8:38 PM, Christal P. Keegan <ckeegan@ag.nv.gov> wrote:
>
> Hi, [redacted]:
>
> As you recall, I am the deputy attorney general that prosecuted this case against Mr. Wayne Tang Case No. 2022-100. We were successful in large part because of your willingness to testify and you're your tremendous efforts to support the State's case - thank you very much.
>
> First things first, when we last spoke you reached out because you were concerned about Mr. Tang's blackmailing your family to pay for his convicted wrong doings. I am foremosthoping this email find you and your family safe and unharmed from his threats.
>
> Second, I wanted to let that Mr. Tang has Petitioned the Commission to reduce his disciplinary terms (see attached filed October 22, 2024). I will be filing our Opposition to his request and wanted to see if you had any updated information.
>
> As an FYI, this request will be heard November 19-21, 2024. I am not sure if you are interested in attending, but if so, I can provide you with the virtual attendance links.
>
> Take care, Sincerely,
> Christal
>
> Christal Park Keegan, Esq.
> Deputy Attorney General
>
> State of Nevada
> Office of the Attorney General
> Department of Business & Industry
> Real Estate Division
> 5420 Kietzke Lane #202
> Reno, Nevada 89511
>
> E: ckeegan@ag.nv.gov | T: 775.687.2141
>
>
>
> Notice of Confidentiality:
> This preceding e-mail message and accompanying documents are covered by the Electronic Communications Privacy Act, 18 U.S.C. SS 2510-2521, and contain information intended for the specific individual(s) only or constitute non-public information. This information may be confidential. If you are not the intended recipient you are hereby notified that you have received this document in error and that any review, dissemination, copying, or the taking of any action based on the contents of this information is strictly prohibited. If you have received this communication in error, please notify me immediately by E-mail, and delete the original message. Use, dissemination, distribution or reproduction of this message by unintended recipients is not authorized and may be unlawful.
>
> -----Original Message-----
> From: Christal P. Keegan
> Sent: Wednesday, May 24, 2023 9:21 AM
> To: [redacted]
> Subject: RE: Recommendation/ Advice
>
> Hi, Ms. [redacted]
>
> You and your father's safety are of utmost importance. Please keep safe.
>
> If he - Mr. Tang - does not pay, we will take his license, pursuant to the Order terms #3.
> https://linkprotect.cudasvc.com/url?
a=https%3a%2f%2fred.nv.gov%2fuploadedFiles%2frednvgov%2fContent%2fMeetings%2fREC%2f2023%2fOrders%2fFebruary%2fTang-Wayne_2022-100.pdf&c=E,1,Re1WmII4G6k2sKhtNfPVcxm0EPagPv3ueKYFIXBQ_6YOYR7Aj05_TSig4Obc1IiTwWqUfyz9Pr1IBdOGhAeLIqjBSOeNJQmy5JmghtD2XANyYo,&typo=1
>
> Sincerely,
> Christal
>

> Christal Park Keegan, Esq.
> Deputy Attorney General
>
> State of Nevada
> Office of the Attorney General
> Department of Business & Industry
> Real Estate Division
> 5420 Kietzke Lane #202
> Reno, Nevada 89511
>
> E: ckeegan@ag.nv.gov | T: 775.687.2141
>
>
>
> Notice of Confidentiality:
> This preceding e-mail message and accompanying documents are covered by the Electronic Communications Privacy Act, 18 U.S.C. SS 2510-2521, and contain information intended for the specific individual(s) only or constitute non-public information. This information may be confidential. If you are not the intended recipient you are hereby notified that you have received this document in error and that any review, dissemination, copying, or the taking of any action based on the contents of this information is strictly prohibited. If you have received this communication in error, please notify me immediately by E-mail, and delete the original message. Use, dissemination, distribution or reproduction of this message by unintended recipients is not authorized and may be unlawful.
>
> -----Original Message-----
> From: [redacted]
> Sent: Tuesday, May 23, 2023 5:15 PM
> To: Christal P. Keegan <ckeegan@ag.nv.gov>
> Subject: Re: Recommendation/ Advice
>
> WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.
>
> Hi Christal,
>
> Thank you for the links and for consulting your colleague.
>
> Mr. Tang has sent numerous messages in Chinese to my father with threats about our personal and family information in order to try to extort money from my father to pay the entire amount owed under the Order. I am not sure if the threat is to publish our sensitive data, but he has tried to intimidate my father by reminding him that he knows where I live.
>
> I will try to pursue different channels including reporting this to the police and seeking consultation with a criminal attorney.
>
> Based on the messages from Mr. Tang to my father, Mr. Tang does not intend to pay the penalty with his own funds. It appears that the only way he will pay the penalties is if he is successful in extorting my father.
>
> All the Best,
> [redacted]
>
>
>> On May 23, 2023, at 12:41 PM, Christal P. Keegan <ckeegan@ag.nv.gov> wrote:
>>
>> Hi, [redacted]
>>
>> I am circling back with you after consulting with another attorney in our office. This case is considered closed once the Commission filed its Order. We have jurisdiction over his license. We did not revoke or suspend Mr. Tang's licensed so our ability to police his actions are hamstrung.
>>
>> As previously stated, you can try finding an attorney through the Nevada State bar. You are probably looking for an attorney to help you file injunctive relief in the courts of law to stop him from publishing you and your father's sensitive information.
>>
>> Thank you,
>> Christal
>>
>> Christal Park Keegan, Esq.
>> Deputy Attorney General
>>
>> State of Nevada
>> Office of the Attorney General
>> Department of Business & Industry
>> Real Estate Division
>> 5420 Kietzke Lane #202
>> Reno, Nevada 89511
>>
>> E: ckeegan@ag.nv.gov | T: 775.687.2141
>>
>>
>>
>> Notice of Confidentiality:
>> This preceding e-mail message and accompanying documents are covered by the Electronic Communications Privacy Act, 18 U.S.C. SS 2510-2521, and contain information intended for the specific individual(s) only or constitute non-public information. This information may be confidential. If you are not the intended recipient you are hereby notified that you have received this document in error and that any review, dissemination, copying, or the taking of any action based on the contents of this information is strictly prohibited. If you have received this communication in error, please notify me immediately by E-mail, and delete the original message. Use, dissemination, distribution or reproduction of this message by unintended recipients is not authorized and may be unlawful.
>>
>> -----Original Message-----
>> From: Christal P. Keegan
>> Sent: Tuesday, May 23, 2023 10:46 AM
>> To: [redacted]
>> Subject: RE: Recommendation/ Advice

>>
>> Hi, [redacted]
>>
>> Thank you for reaching out and bringing this to our attention. First, here is the link to the filed Order against Mr. Tang: https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fred.nv.gov%2fuploadedFiles%2frednvgov%2fContent%2fMeetings%2fREC%2f2023%2fOrders%2fFebruary%2fTang-Wayne_2022-100.pdf&c=E,1,_Gb9fXw89XIhxEFdx2KdCVDHqIXMiY44o5tok_cHYVQLR-xTKbenz4XFl4iKoGoGs-IIJZyYPay5wwqvPflG4sqqVCiRpXh0lRcS__UFOMh5VVIIIaubY,&typo=1
>>
>> Second, I can refer you to the Nevada State Bar to find an attorney.
>> https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fnvbar.org%2ffor-the-public%2ffind-a-lawyer%2f&c=E,1,gBNMjxV8pWEGRwpSrzzpEsJCmupGqi3qJir7ijWRASZpxP-RkiqS8tbfGvFDbJep8s4qMfnWhCLXAGjMezvz44QC12izT2Lri3pEB31RX5_xdGCk0X2npfgb&typo=1
>>
>> I am running this past my colleague. We do not provide representation to parties, but I can review any proof substantiating claims of blackmail and harassing regarding the Division's discipline against him and threats to your father to determine if there is any role we can provide in enforcing this Order against him.
>>
>> Thank you,
>> Christal
>>
>> Christal Park Keegan, Esq.
>> Deputy Attorney General
>>
>> State of Nevada
>> Office of the Attorney General
>> Department of Business & Industry
>> Real Estate Division
>> 5420 Kietzke Lane #202
>> Reno, Nevada 89511
>>
>> E: ckeegan@ag.nv.gov | T: 775.687.2141
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>>
>>
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>>
>> -----Original Message-----
>> From: [redacted]
>> Sent: Monday, May 22, 2023 10:12 PM
>> To: Christal P. Keegan <ckeegan@ag.nv.gov>
>> Subject: Recommendation/ Advice
>>
>> WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.
>>
>> Hi Christal,
>>
>> I hope all has been well with you. I am sorry to bother you about a closed case, but unfortunately Mr. Wayne Tang has decided to harass my father for the penalties that the Nevada Real Estate Commission imposed on Mr. Tang.
>>
>> He is harassing my father to pay the $25,000 fine plus all other expenses involved with getting his real estate license reinstated. He is blackmailing my father to pay the penalty by threatening him with sensitive information that he has on me (from the real estate paperwork that I completed including my financial information, address, contact, etc). Mr. Tang is also threatening my father with other information he has on him regarding my father's taxes and his Las Vegas house purchase back in 2015.
>>
>> I am wondering if you can recommend an attorney that may be able to help us handle this issue. I don't know if I am supposed to find a tax attorney or a lawyer who specializes on blackmail. Any advice you have would be appreciated. I also understand if you are unable to help as this is no longer under your jurisdiction.
>>
>> Thank you very much,
>> [redacted]
>>
>> [redacted]
>
> <Tang Wayne Case# 2022-100 Nov. 19-21 2024 Meeting Notice 10.23.24.pdf><Tang, Wayne Case# 2022-100 EMAIL RE Reconsideration of Discipline 10.22.24.pdf>

EXHIBIT 8

EXHIBIT 8

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

October 23, 2024

Wayne Tang
514 Rio Largo Way
North Las Vegas, Nevada 89031

Certified Mail No.: 9589 0710 5270 0210 3423 24
Emailed to: waynetang.realtor@gmail.com

RE: NRED vs. Wayne Tang
Case No. 2022-100

You have submitted a request to petition the Nevada Real Estate Commission for reconsideration of discipline terms and a payment plan of their decision from the May 2, 2023, hearing. Your request has been scheduled for the next Real Estate Commission meeting at the time, dates and locations listed below.

NOVEMBER 19-21 @ 9:00 AM – In-Person Attendance
With Video Conference To:

Nevada State Business Center
3300 West Sahara Avenue
4th Floor – Nevada Room
Las Vegas, Nevada 89102

Division of Insurance
1818 E. College Parkway
Suite 103
Carson City, Nevada 89706

NOVEMBER 19-21, 2024 @ 9:00 AM – Virtual Attendance Via Telephone or Webex.com

TUESDAY, NOVEMBER 19, 2024
1-844-621-3956 ACCESS CODE/MEETING NUMBER: 2498 656 1619 ##
WEBEX.COM MEETING NUMBER: 2498 656 1619 MEETING PASSWORD: vkEwM4BnT73

WEDNESDAY, NOVEMBER 20, 2024
1-844-621-3956 ACCESS CODE/MEETING NUMBER: 2489 627 5925 ##
WEBEX.COM MEETING NUMBER: 2489 627 5925 MEETING PASSWORD: 733y3yJ2QzJ

THURSDAY, NOVEMBER 21, 2024
1-844-621-3956 ACCESS CODE/MEETING NUMBER: 2486 474 2153 ##
WEBEX.COM MEETING NUMBER: 2486 474 2153 MEETING PASSWORD: eiVi4qZtu73

STACKED CALENDAR: Your hearing is one of several hearings scheduled at the same time as part of a regular meeting of the Commission scheduled for **November 19-21, 2024.** The hearings will begin on **November 19, 2024, at 9:00 a.m., and will continue at 9:00 a.m. each day through November 21, 2024,** or until the Commission has completed its business. Thus, your hearing may be continued until later in the day or from day to day. It is your responsibility to be present when your case is called. If you are not present when your case is called, the Commission will not consider your request and the order will remain in place.

Please contact me if you have questions regarding this matter.

Sincerely,

Kelly Valadez

Kelly Valadez
Commission Coordinator
Telephone: (702) 486-4606
Email: kvaladez@red.nv.gov

cc: Sharath Chandra, Administrator
Commissioners
Christal P. Keegan, Deputy Attorney General