

BEFORE THE REAL ESTATE COMMISSION **FILED**  
STATE OF NEVADA SEP 11 2014

JOSEPH DECKER, Administrator,  
REAL ESTATE DIVISION, DEPARTMENT  
OF BUSINESS & INDUSTRY,  
STATE OF NEVADA,  
  
Petitioner,  
  
vs.  
  
DEMETRIA KALFAS-GORDON,  
  
Respondent.

REAL ESTATE COMMISSION  
*Robert H. ...*  
Case No. RES 13-04-01-289

**COMPLAINT AND NOTICE OF HEARING**

The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND  
INDUSTRY OF THE STATE OF NEVADA ("DIVISION"), by and through its counsel,  
Catherine Cortez Masto, Attorney General of the State of Nevada, and Keith E. Kizer, Deputy  
Attorney General, hereby notifies RESPONDENT DEMETRIA KALFAS-GORDON  
("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL  
ESTATE COMMISSION ("COMMISSION") which will be held pursuant to Chapters 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 645.633 and/or NRS 645.630 and/or NRS 622.400, and the discipline to  
be imposed, if violations of law are proven.

**JURISDICTION**

RESPONDENT DEMETRIA KALFAS-GORDON was at all relevant times mentioned in  
this Complaint licensed as a property manager under license number PM.0163959, and  
licensed as a real estate salesperson under license number S.0051521.PC, and is therefore  
subject to the jurisdiction of the Division and the provisions of NRS Chapter 645 and NAC  
Chapter 645.

...  
...

Attorney General's Office  
555 E. Washington, Suite 3900  
Las Vegas, NV 89101

**FACTUAL ALLEGATIONS**

1  
2 1. RESPONDENT, at the relevant times mentioned in this Complaint, was licensed  
3 as a property manager, license number PM.0163959 since November 18, 2008, and as a real  
4 estate salesperson, license number S.0051521.PC since February 25, 2002, and is currently  
5 in active status, and subject to the jurisdiction of the Division and the provisions of NRS  
6 chapter 645 and NAC chapter 645.

7 2. At relevant times herein, RESPONDENT was the owner and manager of Urban  
8 Element Realty Co. LLC, a Nevada limited-liability company ("Urban").

9 3. Urban provided property management services for landlords and tenants for  
10 both short term and long term rentals.

11 4. Urban is not and has never been registered with the Division to conduct real  
12 estate activity.

13 5. RESPONDENT, through Urban, entered into residential lease agreements on  
14 fifteen (15) properties.

15 6. RESPONDENT, through Urban, entered into property management agreements  
16 on nineteen (19) properties.

17 7. RESPONDENT, through Urban, managed four (4) other properties.

18 8. Pursuant to the property management agreements, RESPONDENT was to  
19 receive between 8% and 10% of the monthly gross collected rents.

20 9. On or about February 14, 2013, RESPONDENT sent out an email indicating she  
21 was a licensed property manager under Urban.

**VIOLATIONS**

22  
23 RESPONDENT has committed the following violations of law:

24 ~~10. RESPONDENT violated NRS 645.230(1)(b) and NRS 645.235(1)(a) by~~  
25 ~~engaging in property management activities without a permit.~~

26 11. RESPONDENT violated NRS 645.630(1)(a) pursuant to NAC 645.610(1)(a) by  
27 advertising under a name for which she is not licensed.

28 . . .



1           **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at the  
2 same time as part of a regular meeting of the Commission that is expected to last from  
3 October 14 through October 16, 2014, or earlier if the business of the Commission is  
4 concluded. Thus, your hearing may be continued until later in the day or from day to  
5 day. It is your responsibility to be present when your case is called. If you are not  
6 present when your hearing is called, a default may be entered against you and the  
7 Commission may decide the case as if all allegations in the complaint were true. If you  
8 have any questions please call Rebecca Hardin, Commission Coordinator (702) 486-  
9 4074.

10           **YOUR RIGHTS AT THE HEARING:** except as mentioned below, the hearing is an  
11 open meeting under Nevada's open meeting law, and may be attended by the public. After  
12 the evidence and arguments, the commission may conduct a closed meeting to discuss your  
13 alleged misconduct or professional competence. A verbatim record will be made by a certified  
14 court reporter. You are entitled to a copy of the transcript of the open and closed portions of  
15 the meeting, although you must pay for the transcription.

16           As the Respondent, you are specifically informed that you have the right to appear and  
17 be heard in your defense, either personally or through your counsel of choice. At the hearing,  
18 the Division has the burden of proving the allegations in the complaint and will call witnesses  
19 and present evidence against you. You have the right to respond and to present relevant  
20 evidence and argument on all issues involved. You have the right to call and examine  
21 witnesses, introduce exhibits, and cross-examine opposing witnesses on any matter relevant  
22 to the issues involved.

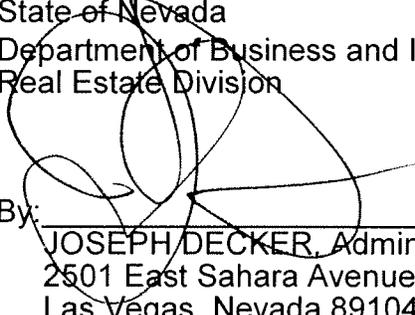
23           You have the right to request that the Commission issue subpoenas to compel  
24 ~~witnesses to testify and/or evidence to be offered on your behalf.~~ In making the request, you  
25 may be required to demonstrate the relevance of the witness' testimony and/or evidence.  
26 Other important rights you have are listed in NRS 645.680 through 645.990, NRS Chapter  
27 233B, and NAC 645.810 through 645.920.

28 . . .

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

5 DATED this 11<sup>th</sup> day of September, 2014.

6 State of Nevada  
7 Department of Business and Industry  
8 Real Estate Division

9 By:   
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14 CATHERINE CORTEZ MASTO  
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