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REAL ESTATE COMMISSION
BY *[Signature]*

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

JOSEPH R. DECKER, Administrator,
REAL ESTATE DIVISION, DEPARTMENT
OF BUSINESS & INDUSTRY,
STATE OF NEVADA,

Case No. 2015-1917

Petitioner,

vs.

COMPLAINT AND NOTICE OF HEARING

BLANCA PAREDES,

Respondent.

The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY OF THE STATE OF NEVADA ("Division"), by and through its counsel, Adam Paul Laxalt, Attorney General of the State of Nevada, and Keith E. Kizer, Deputy Attorney General, hereby notifies RESPONDENT BLANCA PAREDES ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL ESTATE COMMISSION ("Commission"). The hearing 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 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 engaged in activities which require a license as a real estate broker, real estate broker-salesperson, or real estate salesperson, and a permit to engage in property management, issued by the Division and is, therefore, subject to the jurisdiction of the Division and the provisions of NRS and NAC 645.

FACTUAL ALLEGATIONS

1. On or about October 11, 2011, the Division filed a Complaint for Disciplinary Action ("2011 Complaint") against RESPONDENT, alleging she violated NRS 645.230(1)(b)

...

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

1 and NRS 645.235(1)(a) by engaging and offering to engage in property management activity
2 without first obtaining the required license and permit from the Division.

3 2. On or about February 14, 2012, RESPONDENT and the Division submitted a
4 Stipulation for Settlement of Disciplinary Action to the Commission for approval.

5 3. In that Stipulation for Settlement of Disciplinary Action, RESPONDENT admitted
6 to the facts and violations of law as alleged in the 2011 Complaint, agreed to cease and desist
7 all property management activities, and agreed to a \$5,000 administrative fine.

8 4. On or about May 16, 2012, the Commission issued an Order Approving
9 Stipulation for Settlement of Disciplinary Action.

10 5. RESPONDENT has never obtained from the Division a license as a real estate
11 broker, real estate broker-salesperson, or real estate salesperson.

12 6. RESPONDENT has never obtained from the Division a permit to engage in
13 property management.

14 7. RESPONDENT is the Resident Agent and a Managing Member of Mare
15 Investment Group, LLC ("Mare").

16 8. Aberash T. Gessese ("Gessese") owned rental property located at 7857
17 Somerhill Point Way, Las Vegas, Nevada (the "Property").

18 9. In or around February 2015, RESPONDENT informed Gessese that
19 RESPONDENT knew of a person who was interested in leasing the Property.

20 10. RESPONDENT and Gessese agreed that Gessese would pay RESPONDENT
21 five percent (5%) of the annual rent (\$14,400) as compensation for obtaining the Tenant for
22 the Property.

23 11. On or about February 15, 2015, RESPONDENT obtained the move-in
24 information for the Property and the applicant information for the Tenant.

25 12. At or about that same time, RESPONDENT collected \$1,959 from the Tenant for
26 prorated rent, security deposit, and cleaning/key deposit.

27 13. On or about February 25, 2015, RESPONDENT submitted an expense billing
28 report to Gessese for her \$720 fee (5% of \$14,400).

1 14. RESPONDENT's expense billing report states that Mare will provide "eviction
2 services [and] monitor payments for 12 months at agency's cost."

3 15. After deducting her \$720 fee, RESPONDENT, through Mare, sent Gessese a
4 check for \$1,239 on or about February 25, 2015.

5 16. On or about March 5, 2015, RESPONDENT told Gessese that RESPONDENT
6 had voided the \$1,239 check to Gessese because the Tenant was unsatisfied with the
7 Property.

8 17. On or about July 9, 2015, Gessese filed a Statement of Fact with the Division
9 complaining about RESPONDENT's conduct.

10 **VIOLATIONS**

11 RESPONDENT has committed the following violation of law:

12 18. RESPONDENT violated NRS 645.230(1)(b) by engaging in property
13 management activity without first obtaining from the Division a license as a real estate broker,
14 real estate broker-salesperson, or real estate salesperson, and a permit to engage in property
15 management.

16 **DISCIPLINE AUTHORIZED**

17 1. Pursuant to NRS 645.235, the Commission is empowered to impose an
18 administrative fine in an amount not to exceed the amount of gain or economic benefit that the
19 person derived from the violation or \$5,000, whichever amount is greater, against
20 RESPONDENT for each violation of NRS 645.230.

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

24 3. Therefore, the DIVISION requests that the Commission take such disciplinary
25 action as it deems appropriate under the circumstances.

26 **NOTICE OF HEARING**

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

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

3 **THE HEARING WILL TAKE PLACE on December 16, 2015 commencing at 9:00**
4 **a.m., or as soon thereafter as the Commission is able to hear the matter, and each day**
5 **thereafter commencing at 9:00 a.m. through December 17, 2015, or earlier if the**
6 **business of the Commission is concluded. The Commission meeting will be held on**
7 **December 16, 2015, at the Nevada Department of Employment Training and**
8 **Rehabilitation, 2800 East St. Louis Avenue, Conference Room A-C, Las Vegas, NV**
9 **89104. The meeting will continue on December 17, 2015, should business not be**
10 **concluded, starting at 9:00 a.m. at the Henderson City Hall, Council Chambers, 240**
11 **South Water Street, Henderson, Nevada 89015.**

12 **STACKED CALENDAR: Your hearing is one of several hearings scheduled at the**
13 **same time as part of a regular meeting of the Commission that is expected to last from**
14 **December 16 through December 17, 2015, or earlier if the business of the Commission**
15 **is concluded. Thus, your hearing may be continued until later in the day or from day to**
16 **day. It is your responsibility to be present when your case is called. If you are not**
17 **present when your hearing is called, a default may be entered against you and the**
18 **Commission may decide the case as if all allegations in the complaint were true. If you**
19 **have any questions please call Rebecca Hardin, Commission Coordinator (702) 486-**
20 **4074.**

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

27 **As the Respondent, you are specifically informed that you have the right to appear and**
28 **be heard in your defense, either personally or through your counsel of choice. At the hearing,**

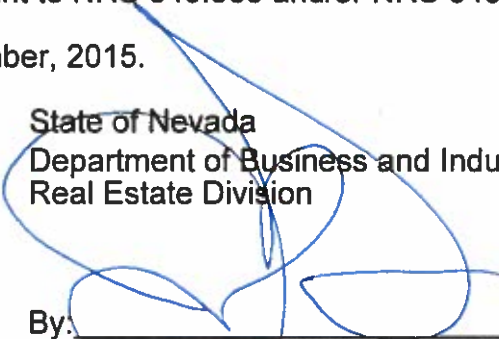
1 the Division has the burden of proving the allegations in the complaint and will call witnesses
2 and present evidence against you. You have the right to respond and to present relevant
3 evidence and argument on all issues involved. You have the right to call and examine
4 witnesses, introduce exhibits, and cross-examine opposing witnesses on any matter relevant
5 to the issues involved.

6 You have the right to request that the Commission issue subpoenas to compel
7 witnesses to testify and/or evidence to be offered on your behalf. In making the request, you
8 may be required to demonstrate the relevance of the witness' testimony and/or evidence.
9 Other important rights you have are listed in NRS 645.680 through 645.990, NRS Chapter
10 233B, and NAC 645.810 through 645.875.


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

15 DATED this 10TH day of November, 2015.

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

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