

1 BEFORE THE REAL ESTATE COMMISSION

**FILED**

2 STATE OF NEVADA

JUL 29 2020

3 SHARATH CHANDRA, Administrator,  
4 REAL ESTATE DIVISION,  
5 DEPARTMENT  
6 OF BUSINESS & INDUSTRY,  
7 STATE OF NEVADA,

REAL ESTATE COMMISSION  
BY *Evelyn Talle*  
Case No. 2018-0716

8 Petitioner,

**COMPLAINT AND NOTICE OF  
HEARING**

9 vs.

10 RON HOY,

11 Respondent.

12 The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND  
13 INDUSTRY OF THE STATE OF NEVADA ("Division"), by and through its counsel, Aaron  
14 D. Ford, Attorney General of the State of Nevada, and Peter Keegan, Deputy Attorney  
15 General, hereby notifies RESPONDENT RON HOY ("RESPONDENT") of an  
16 administrative hearing before the STATE OF NEVADA REAL ESTATE COMMISSION  
17 ("Commission"). The hearing will be held pursuant to Chapter 233B and Chapter 645 of the  
18 Nevada Revised Statutes ("NRS") and Chapter 645 of the Nevada Administrative Code  
19 ("NAC"). The purpose of the hearing is to consider the allegations stated below and to  
20 determine if the RESPONDENT should be subject to an administrative penalty or other  
21 discipline authorized by NRS 645 and/or NAC 645, if violations of law are proven.

**JURISDICTION**

22 At all times relevant, RESPONDENT held a real estate broker license,  
23 B.0017991.CORP. RESPONDENT engaged in activities which require a license as a real  
24 estate broker, real estate broker-salesperson, or real estate salesperson, and/or a permit to  
25 engage in property management, issued by the Division and is, therefore, subject to the  
26 jurisdiction of the Division and the Commission, and the provisions of NRS and NAC 645.

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## PROCEDURAL HISTORY

1  
2 1. On or about December 11, 2018, the Division received an email from the  
3 Sherine Kuckhoff ("Kuckhoff") indicating that she had recently lost her property  
4 management permit and that she had neglected to renew it.

5 2. On or about December 11, 2018, the Division responded to Kuckhoff and  
6 informed her that her property management permit had expired on January 31, 2013.

7 3. On or about December 18, 2018, Kuckhoff met with the Division's investigator  
8 and explained that she had acted in the capacity of a property manager since February of  
9 2013, while being unaware her property management's permit had expired.

10 4. On or about December 18, 2018, an investigation opening-letter was sent to  
11 Kuckhoff and required her to provide a sworn statement explaining her failure to timely  
12 renew her property management permit.

13 5. On or about December 18, 2018, an investigation opening-letter was also sent  
14 to Kuckhoff's broker-salesperson manager, Ronald B. Stichter ("Stichter"),  
15 BS.0032575.MGR, at Coldwell Banker Select Real Estate of Nevada Inc., requiring him to  
16 provide a sworn statement explaining how Kuckhoff, while under his supervision, was  
17 allowed to act in the capacity of a property manager without a valid property manager's  
18 permit.

19 6. On or about December 18, 2018, an investigation opening-letter was also sent  
20 to RESPONDENT, B.0017991.CORP, Kuckhoff's broker of record, requiring him to provide  
21 a sworn statement explaining how Kuckhoff, while under his supervision, was allowed to  
22 act in the capacity of a property manager without a valid property manager's permit.

23 7. On or about December 29, 2018, the Division received Kuckhoff's sworn  
24 affidavit.

25 8. On or about December 28, 2018, the Division received Stichter's sworn  
26 affidavit.

27 9. On or about January 2, 2019, the Division received RESPONDENT's sworn  
28 affidavit.



1           8.     On or about January 31, 2013, Kuckhoff's broker-salesperson license and  
2 property management permit expired and were due for renewal.

3           9.     Kuckhoff properly renewed her property management permit at least once  
4 between 2008 and 2013.

5           10.    On or about February 20, 2013, Kuckhoff submitted her renewal application  
6 for her broker-salesperson license, along with a late fee.

7           11.    Kuckhoff's February 20, 2013, renewal application did not include her  
8 property management permit number or the renewal fee for the property manager's permit.

9           12.    Between January 10, 2013, and February 20, 2013, there were attempts made  
10 by Kuckhoff to submit her broker-salesperson renewal application, which were rejected;  
11 however, none of those applications included her property management permit.

12          13.    On February 21, 2013, the Division sent Kuckhoff a Deficient Transaction  
13 notification, which required Kuckhoff to submit Division form 544 with original signatures  
14 to complete her broker-salesperson, BS.0005345 license reinstatement.

15          14.    On January 23, 2017, the Division received Kuckhoff's continuing education  
16 certificates and renewal fee for her broker-salesperson license, BS.0005345.

17          15.    On or about January 23, 2017, the Division sent Kuckhoff a Deficient  
18 Transaction notification, which required Kuckhoff to submit proof of 3 hours of Broker  
19 Management and to complete and submit Division form 580 to complete the renewal of her  
20 broker-salesperson, BS.0005345 license.

21          16.    On or about December 11, 2018, the Division received an email from the  
22 Kuckhoff indicating that she had recently lost her property management permit and that  
23 she had neglected to renew it.

24          17.    On or about December 11, 2018, the Division notified Kuckhoff that she would  
25 not be allowed to renew her property manager's permit and would be required to submit a  
26 new application for a property manager's permit as required by NRS 645.785.

27          18.    Kuckhoff conducted property management activities from February 1, 2013,  
28 through at least December 18, 2018, without a property management permit.



1 **NOTICE OF HEARING**

2 **PLEASE TAKE NOTICE**, that a disciplinary hearing has been set to consider this  
3 Administrative Complaint against the above-named RESPONDENTS in accordance with  
4 Chapters 233B and 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada  
5 Administrative Code.

6 **THE HEARING WILL TAKE PLACE** at the Commission meeting scheduled for  
7 September 1-3, 2020, beginning at approximately 9:00 a.m. each day, or until such time as  
8 the Commission concludes its business.

9 If the Governor's Emergency Directive 006 - suspending physical location  
10 requirements - is extended through the date of the meeting, then the hearing will be held  
11 via virtual meeting. The Commission uses WebEx for its meetings. To join the hearing go  
12 to the Webex.com website and put in the Access code and Attendee ID:

13 **TUESDAY, SEPTEMBER 1, 2020** Meeting number (Access code): 146 276 8028  
14 Password (Attendee ID): MgCrCbJq662 (64272257662 from phones and video systems)

15 **WEDNESDAY, SEPTEMBER 2, 2020** Meeting number (Access code): 146 650 1911  
16 Password (Attendee ID): 2rGzteBYY24 (27498329924 from phones and video systems)

17 **THURSDAY, SEPTEMBER 3, 2020** Meeting number (Access code): 146 520 3582  
18 Password (Attendee ID): umV3mJJ2gP2 (86836552472 from phones and video systems)

19 If you do not have internet access, you may attend by phone at 1-844-621-3956 using  
20 the access codes and attendee IDs listed above. Some mobile devices may ask attendees to  
21 enter a numeric attendee ID provided above. If Emergency Directive 006 is not extended  
22 and the meeting is held in person, then the meeting will be located at the following  
23 locations:

24 Nevada State Business Center  
25 Real Estate Division  
26 3300 West Sahara Avenue, Suite 350  
27 Las Vegas, NV 89102

28 If you would like an email containing this information, before the hearing, please  
contact Evelyn Pattee, Commission Coordinator, at (702) 486-4074 or epattee@red.nv.gov.

1           **STACKED CALENDAR:** Your hearing is one of several hearings scheduled  
2 at the same time as part of a regular meeting of the Commission that is expected  
3 to last from September 1st through September 3, 2020, but may end earlier if the  
4 business of the Commission is concluded. Thus, your hearing may be continued  
5 until later in the day or from day to day. It is your responsibility to be present  
6 when your case is called. If you are not present when your hearing is called, a  
7 default may be entered against you and the Commission may decide the case as  
8 if all allegations in the complaint were true. If you have any questions please call  
9 Evelyn Pattee Commission Coordinator (702) 486-4074.

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

16           As the **RESPONDENT** you are specifically informed that you have the right to  
17 appear and be heard in your defense, either personally or through your counsel of choice.  
18 At the hearing, the Division has the burden of proving the allegations in the complaint and  
19 will call witnesses and present evidence against you. You have the right to respond and to  
20 present relevant evidence and argument on all issues involved. You have the right to call  
21 and examine witnesses, introduce exhibits, and cross-examine opposing witnesses on any  
22 matter relevant 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,  
25 you may be required to demonstrate the relevance of the witness' testimony and/or  
26 evidence. Other important rights you have are listed in NRS 645.680 through 645.990, NRS  
27 Chapter 233B, and NAC 645.810 through 645.920.

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

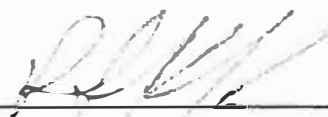
5  
6 DATED this 27 day of July, 2020.

DATED this 23<sup>rd</sup> day of July, 2020.

7  
8 STATE OF NEVADA,  
9 Department of Business & Industry  
10 Real Estate Division

AARON D. FORD  
Attorney General

11 By:   
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13 Administrator  
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21 *Attorneys for the Real Estate Division*