

1 **BEFORE THE COMMISSION OF APPRAISERS OF REAL ESTATE**
2 **STATE OF NEVADA**

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

7 Petitioner,

8 vs.

9 JOHN W. PACE,

10 Respondent.

Case No. 2025-160

FILED

JUN 05 2025

NEVADA COMMISSION OF APPRAISERS

mga/lo

11 **COMPLAINT AND NOTICE OF HEARING**

12 State of Nevada, Department of Business and Industry, Real Estate Division ("the
13 Division"), by and through counsel, Attorney General AARON D. FORD and Deputy
14 Attorney General CHRISTAL PARK KEEGAN, hereby notifies JOHN W. PACE
15 ("Respondent") of an administrative complaint and hearing which is to be held pursuant
16 to Chapter 233B and Chapter 645C of the Nevada Revised Statutes ("NRS") and Chapter
17 645C of the Nevada Administrative Code ("NAC"). The purpose of the hearing is to
18 consider the allegations stated below and to determine if the Respondent should be
19 subject to a disciplinary penalty as set forth in NRS 645C and/or NAC 645C, if the stated
20 allegations are proven at the hearing by the evidence presented.

21 **JURISDICTION**

22 At all times relevant to this Complaint, the Respondent held himself out and/or
23 otherwise performed acts for which a certificate, license, permit, registration or
24 registration card or any type of authorization is required, and therefore, is subject to the
25 Jurisdiction of the Division and the provisions of NRS and NAC Chapter 645C.

26 **PROCEDURAL HISTORY**

27 1. On or about August 30, 2022, the Division received a complaint alleging
28 the Respondent's appraisal report was subject to a desk review and noted there
...

1 was assistance from another appraiser who had a Utah license ("Complaint").
2 000002 – 000003.

3 2. Upon investigation of the Complaint, *Case No. 2022-635 Nevada Real*
4 *Estate Division v. Melvin S. Mitchell (License No. A.0207161-CR)*, it was found that
5 Respondent has performed significant appraisal assistance on the subject property
6 valuation. 000040, 000053, 000017.

7 3. At all times relevant, Respondent was licensed in Utah (UT License
8 10921769-LA00) and not licensed in Nevada. 000097 – 000102.

9 4. Pursuant to NRS 645.490, a course of conduct which is shown to have been
10 persistently and consistently followed by the appraiser guilty of unprofessional conduct is
11 prima facie evidence of that knowledge on the part of the associate.

12 **FACTUAL ALLEGATIONS**

13 1. The Respondent provided significant assistance beyond clerical tasks in
14 developing the appraisal ("Appraisal Report") for the property located at 648 Andys Way,
15 Elko, NV 89801 ("Subject") with an opinion of value of \$1,250,000 as of effective date July
16 15, 2022. 000005, 000041.

17 2. Specifically, the Appraisal Report's Supplemental Addendum represented
18 the Respondent provided significant assistance, unlimited to: exterior/interior property
19 inspection, neighborhood research, sketch, photos, data imputing, sales comparison
20 analysis, 1004 MC, highest and best use, land value estimated cost to complete
21 remodeling, income value estimate, improvement cost estimate and appraisal report
22 preparation. 000053, 000040.

23 3. There is no evidence that the Respondent has ever submitted for and/or been
24 issued Nevada credentials. 000097.

25 4. Despite the fact that according to the Appraiser Registry Report, the
26 Respondent Utah license was effective January 10, 2022, approximately six (6) months
27 prior to the effective date of the Appraisal Report. 000098 – 000102.

5. Accordingly, on or about March 6, 2025, the Division noticed the Respondent that it intended to proceed with formal disciplinary action before this Commission.

000103 – 000104.

VIOLATIONS OF LAW

First Violation

The Respondent violated NRS 645C.215(1)(a) for engaging in the business of, acting in the capacity or, and/or assuming to act as an appraiser in performing significant appraisal assistance on a Nevada real property appraisal without a Nevada license.

DISCIPLINE AUTHORIZED

1. Pursuant to NRS 645C.215(2), if the Commission imposes an administrative fine against a person pursuant to this section, the amount of the administrative fine may not exceed the amount of any gain or economic benefit that the person derived from the violation or \$5,000, whichever amount is greater.

2. Additionally, under NRS 622.400, the Commission is authorized to impose the costs of the proceeding upon the Respondent, including investigative costs and attorney's fees, if the Commission otherwise imposes discipline on the Respondent.

3. Therefore, the Division requests the Commission to impose such discipline as it determines is appropriate under the circumstances and to award the Division its costs and attorney's fees for this proceeding.

PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this Administrative Complaint against the above-named Respondent in accordance with Chapter 233B and Chapter 645C of the Nevada Revised Statutes and Chapter 645C of the Nevada Administrative Code.

THE HEARING WILL TAKE PLACE at the Commission meeting scheduled for July 22-24, 2025, beginning at approximately 9:00 a.m. each day, or until such time as the Commission concludes its business. The Commission meeting will be held at the Nevada State Business Center, 3300 W. Sahara Avenue, Nevada Room 4th Floor, Las Vegas, Nevada 89102, with video conference to: Department

1 of Business and Industry, 1818 E. College Parkway, Suite 103, Carson City,
2 Nevada 89706.

3 **STACKED CALENDAR:** Your hearing is one of several hearings that may
4 be scheduled at the same time as part of a regular meeting of the Commission
5 that is expected to take place on July 22-24, 2025. Thus, your hearing may be
6 continued until later in the day or from day to day. It is your responsibility to
7 be present when your case is called. If you are not present when your case is
8 called, a default may be entered against you, and the Commission may decide
9 the case as if all allegations in the complaint were true. If you need to negotiate
10 a more specific time for your hearing in advance, because of coordination with
11 out-of-state witnesses or the like, please call Maria Gallo, Commission
12 Coordinator, at (702) 486-4074.

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

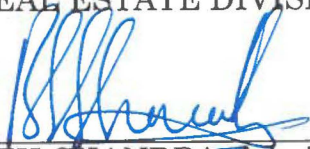
19 As the Respondent, you are specifically informed that you have the right to appear
20 and be heard in your defense, either personally or through your counsel of choice. At the
21 hearing, the Division has the burden of proving the allegations in the complaint and will
22 call witnesses and present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

26 You have the right to request that the Commission issue subpoenas to compel
27 witnesses to testify and/or evidence to be offered on your behalf. In making this request,
28 you may be required to demonstrate the relevance of the witnesses' testimony and/or

1 evidence. Other important rights you have are listed in NRS Chapter 645C, NRS
2 Chapter 233B, and NAC Chapter 645C.

3
4 DATED the 6 day of June, 2025.

5 NEVADA REAL ESTATE DIVISION

6
7 By: 
8 SHARATH CHANDRA, Administrator
9 3300 W. Sahara Avenue, Suite 350
10 Las Vegas, Nevada 89102
11 (702) 486-4033

DATED the 3rd day of June, 2025.

AARON D. FORD
Attorney General

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