

FILED

APR 18 2017

REAL ESTATE COMMISSION
BY *[Signature]*

BEFORE THE REAL ESTATE COMMISSION
STATE OF NEVADA

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

Case No. 2015-2813

Petitioner,

vs.

TIRAN KAROUDO,

Respondent.

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, Adam Paul Laxalt, Attorney General of the State of Nevada, and Keith E. Kizer, Senior Deputy Attorney General, hereby notifies RESPONDENT TIRAN KAROUDO ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL ESTATE 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 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 was at all relevant times mentioned in this Complaint licensed by the Division as a salesperson under license number S.0172287, and is therefore subject to the jurisdiction of the Division and the Commission and the provisions of NRS chapter 645 and NAC chapter 645.

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1 **FACTUAL ALLEGATIONS**

2 1. RESPONDENT has been licensed as a salesperson under license number S.0172287,
3 since October 4, 2012.

4 2. During a period of time of that licensure, RESPONDENT was licensed as Tiran (Tony)
5 Karoudo.

6 3. At all times relevant to this Complaint, RESPONDENT was associated with broker
7 Sharon J. Bental at 1st Choice Realty & Property Management.

8 4. In or around October 2012, Avraham Bardugo purchased real property at 1416 Hiawatha
9 Road, Las Vegas, Nevada (the "Property").

10 5. Bardugo engaged RESPONDENT to manage the Property.

11 6. RESPONDENT did not inform Bental that RESPONDENT was managing the Property.

12 7. Up until approximately June 2015, RESPONDENT accepted rent payments and security
13 deposits from renters of the Property.

14 8. RESPONDENT did not place those rent payments and security deposits in the custody
15 of Bental.

16 9. On or about May 27, 2015, RESPONDENT executed a Residential Lease Agreement
17 with tenants for the Property.

18 10. In that Residential Lease Agreement, RESPONDENT indicated that he was representing
19 1st Choice Realty & Property Management.

20 11. On or about October 5, 2015, Bardugo filed a Statement of Fact with the Division
21 complaining about RESPONDENT's conduct.

22 **VIOLATIONS**

23 RESPONDENT has committed the following violations of law:

24 12. RESPONDENT violated NRS 645.230(1)(b) by engaging in the business of, acting in
25 the capacity of, or advertising or assuming to act as a property manager without first obtaining a
26 property management permit issued by the Division.

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28 ...

1 13. RESPONDENT violated NRS 645.630(1)(i) by failing to place in the custody of
2 Bental, as soon as possible, a deposit or other money or consideration entrusted to him by a person
3 dealing with him as the representative of Bental.

4 14. RESPONDENT violated NAC 645.650(2) by failing to provide paperwork to Bental
5 within 5 calendar days after that paperwork was executed by all the parties.

6 **DISCIPLINE AUTHORIZED**

7 15. Pursuant to NRS 645.630 and NRS 645.633, the Commission is empowered to
8 impose an administrative fine of up to \$10,000 per violation against RESPONDENT and further to
9 suspend, revoke or place conditions on the license of RESPONDENT.

10 16. Additionally, under NRS Chapter 622, the Commission is authorized to impose costs
11 of the proceeding upon RESPONDENT, including investigative costs and attorney’s fees, if the
12 Commission otherwise imposes discipline on RESPONDENT.

13 17. Therefore, the Division requests that the Commission take such disciplinary action as
14 it deems appropriate under the circumstances.

15 **NOTICE OF HEARING**

16 **PLEASE TAKE NOTICE** that a disciplinary hearing has been set to consider the
17 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B and
18 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada Administrative Code.

19 **THE HEARING WILL TAKE PLACE** on May 23, 2017 commencing at 9:00 a.m., or as
20 soon thereafter as the Commission is able to hear the matter, and each day thereafter
21 commencing at 9:00 a.m. through May 25, 2017, or earlier if the business of the Commission is
22 concluded. The Commission meeting will be held on May 23-25, 2017, at the Nevada State
23 Business Center, 3300 West Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102.

24 **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at the same
25 time as part of a regular meeting of the Commission that is expected to last from May 23-25,
26 2017, or earlier if the business of the Commission is concluded. Thus, your hearing may be
27 continued until later in the day or from day to day. It is your responsibility to be present when
28 your case is called. If you are not present when your hearing is called, a default may be entered

1 against you and the Commission may decide the case as if all allegations in the complaint were
2 true. If you have any questions please call Rebecca Hardin, Commission Coordinator (702) 486-
3 4074.

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9 entered against you and the Commission may decide the case as if all allegations in the complaint
10 were true. If you have any questions please call Rebecca Hardin, Commission Coordinator (702)
11 486-4074.

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

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


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

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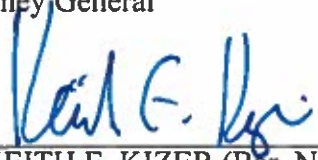
1 The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or
2 NAC 645 and if the allegations contained herein are substantially proven by the evidence
3 presented and to further determine what administrative penalty is to be assessed against the
4 RESPONDENT, if any, pursuant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

5 DATED this 17 day of April, 2017.

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

9 By: 
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14 ADAM PAUL LAXALT
15 Attorney General

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