

FILED

BEFORE THE REAL ESTATE COMMISSION

DEC 15 2017

STATE OF NEVADA

REAL ESTATE COMMISSION
[Signature]

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

Case No. 2016-3373

Petitioner,

vs.

JULES (J.J.) MITCHELL LEHR,

Respondent.

AMENDED COMPLAINT

The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY OF THE STATE OF NEVADA ("Division"), by and through its counsel, for its Amended Complaint against the RESPONDENT JULES (J.J.) MITCHELL LEHR ("RESPONDENT"), states and alleges as follows:

JURISDICTION

RESPONDENT was at all relevant times mentioned in this Complaint licensed as a Salesperson under license number S.0174507, and is therefore subject to the jurisdiction of the Division and the Commission, and the provisions of NRS chapter 645 and NAC chapter 645.

FACTUAL ALLEGATIONS

1. RESPONDENT has been licensed as a Salesperson, license number S.0174507 since April 1, 2014, and is in active status.

2. At all times relevant to the Complaint, RESPONDENT was affiliated with Limestone Investment LLC, under broker James H. Eagan.

3. In August 2016, the Division discovered that RESPONDENT had posted multiple advertisements for the sale of real property on craigslist.

4. Many, if not all, of those advertisements did not list Limestone Investment LLC.

...

1 5. On or about August 31, 2016, the Administrator of the Real Estate Division issued
2 RESPONDENT a Notice of Violation with the Imposition of Administrative Fine in the amount of
3 \$1,000.00 for violations of NRS 645.315(1)(b) pursuant to NAC 645.610(1)(c), and NAC 645.611.

4 6. RESPONDENT timely appealed the \$1,000.00 administrative fine.

5 **VIOLATIONS**

6 RESPONDENT has committed the following violations of law:

7 7. RESPONDENT violated NRS 645.315(1)(b) pursuant to NAC 645.610(1)(c) on at least
8 two occasions by failing to disclose the name of the brokerage with whom RESPONDENT was
9 associated in advertisements through which RESPONDENT offered to perform services for which a
10 license is required pursuant to NRS 645.

11 **DISCIPLINE AUTHORIZED**

12 8. Pursuant to NAC 645.695, the Commission is empowered to impose an administrative
13 fine of up to \$1,000.00 against RESPONDENT and further to suspend, revoke or place conditions on
14 the license of RESPONDENT.


15 9. Additionally, under NRS Chapter 622, the Commission is authorized to impose costs of
16 the proceeding upon RESPONDENT, including investigative costs and attorney's fees, if the
17 Commission otherwise imposes discipline on RESPONDENT.

18 10. Therefore, the Division requests that the Commission take such disciplinary action as it
19 deems appropriate under the circumstances.

20 DATED this 11th day of December, 2017.

21
22
23
24
25
26
27
28

ADAM PAUL LAXALT
Attorney General


By: 

KEITH E. KIZER (Bar. No. 4305)
Senior Deputy Attorney General
555 East Washington Ave., Ste. 3900
Las Vegas, Nevada 89101
(702) 486-3326
Attorneys for Real Estate Division

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on the 12th day of December, 2017, I served a copy of the foregoing document by depositing a true copy thereof in the U.S. mail, postage paid, addressed as follows:

Andrew H. Pastwick, Esq.
LAW OFFICE OF ANDREW H. PASTWICK, LLC
1810 E. Sahara Avenue, Suite 120
Las Vegas, NV 89104


Danielle Wright, an employee of
the office of the Nevada Attorney General

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28