

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Petitioner,

vs.

JULES MITCHELL LEHR,

Respondent.

Case No. 2018-1584

FILED

MAY 15 2020

REAL ESTATE COMMISSION

BY *Emily Tattle*

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, Aaron D. Ford, Attorney General of the State of Nevada, and Dennis L. Belcourt, Deputy Attorney General, hereby notifies RESPONDENT JULES MITCHELL LEHR ("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 645.235, NRS 645.633, NRS 645.630 and NRS 622.400, and the discipline to be imposed, if violations of law are proven.

JURISDICTION

RESPONDENT at all relevant times mentioned in this Complaint was licensed as a real estate salesperson by the Division, and, although not holding a permit to manage property issued by the Division, conducted activities for which such a permit is required. He 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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FACTUAL ALLEGATIONS

1. RESPONDENT has been licensed by the Division as a real estate salesperson, S.0174507. At all relevant times mentioned in this Complaint, RESPONDENT was under the broker American Realty Properties, LLC. His most recent broker is Sin City Realty, LLC.

2. With the knowledge and permission of the owner, Jian Li ("the owner"), on or about June 13, 2018, RESPONDENT leased on the owner's behalf his rental property at 9504 Valley Hills, Las Vegas, Nevada 89134 (9504 Valley Hills) to Trenity Blanton, who failed to move in.

3. On or about July 2, 2018, RESPONDENT again rented out 9504 Valley Hills, this time to Mr. Derell Love.

4. Said rental was done without the owner's knowledge.

5. RESPONDENT failed to remit the portion owed to the owner that he collected from either Ms. Blanton or Mr. Love.

6. RESPONDENT had previously settled a matter before the Commission, case no. 2016-2164, involving managing property without a permit.

7. On or about November 26, 2018, the Division issued a Cease and Desist Order to Respondent that he cease and desist from acting in the capacity of a property manager.

VIOLATIONS

RESPONDENT has committed the following violations of law:

8. RESPONDENT violated NRS 645.235(1)(b) by engaging or offering to engage in an activity for which a property management permit issued by the Division is required, without an active permit in place.

9. RESPONDENT violated NRS 645.635(1), by offering 9504 Valley Hills without the owner's knowledge.

10. RESPONDENT violated NRS 645.630(1)(f), by failing, within a reasonable time, to account for or to remit money which he received from tenant(s) that belonged to the owner.

DISCIPLINE AUTHORIZED

11. Pursuant to NRS 645.630 and NRS 645.633, the Commission is empowered to impose an administrative fine per violation against RESPONDENT that may not exceed \$10,000, and

1 further to suspend, revoke or place conditions on the license of RESPONDENT, for his violation of
2 NRS 645.635(1).

3 12. Pursuant to NRS 645.235(2), the Commission may impose an administrative fine for
4 property management without a permit that may not exceed the amount of gain or economic benefit the
5 RESPONDENT received or \$5,000, whichever is greater.

6 13. Additionally, under NRS Chapter 622, the Commission is authorized to impose costs
7 of the proceeding upon RESPONDENT, including investigative costs and attorney's fees, if the
8 Commission otherwise imposes discipline on RESPONDENT.

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

11 NOTICE OF HEARING

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

15 THE HEARING WILL TAKE PLACE on June 16, 2020 commencing at 9:00 a.m., or as
16 soon thereafter as the Commission is able to hear the matter, and each day thereafter
17 commencing at 9:00 a.m. through June 18, 2020, or earlier if the business of the Commission is
18 concluded. The Commission meeting will be held on June 16, 2020, at the Nevada State Business
19 Center, 3300 West Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102. The
20 meeting will continue on June 17, 2020, at the Nevada State Business Center, 3300 West Sahara
21 Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102, commencing at 9:00 a.m., and on
22 June 18, 2020, should business not be concluded, starting at 9:00 a.m. at the Nevada State
23 Business Center, 3300 West Sahara Avenue, 4th Floor – Tahoe 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 June 16, 2020,
26 through June 18, 2020, or earlier if the business of the Commission is concluded. Thus, your
27 hearing may be continued until later in the day or from day to day. It is your responsibility to be
28 present when your case is called. If you are not present when your hearing is called, a default

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

4 YOUR RIGHTS AT THE HEARING: except as mentioned below, the hearing is an open
5 meeting under Nevada's open meeting law, and may be attended by the public. After the evidence and
6 arguments, the commission may conduct a closed meeting to discuss your alleged misconduct
7 or professional competence. You are entitled to a copy of the transcript of the open and closed
8 portions of the meeting, although you must pay for the transcription.

9 As the RESPONDENT, you are specifically informed that you have the right to appear and be
10 heard in your defense, either personally or through your counsel of choice. At the hearing, the Division
11 has the burden of proving the allegations in the complaint and will call witnesses and present evidence
12 against you. You have the right to respond and to present relevant evidence and argument on all issues
13 involved.

14 You have the right to call and examine witnesses, introduce exhibits, and cross-examine
15 opposing witnesses on any matter relevant to the issues involved.

16 You have the right to request that the Commission issue subpoenas to compel witnesses to
17 testify and/or evidence to be offered on your behalf. In making the request, you may be required to
18 demonstrate the relevance of the witness' testimony and/or evidence. Other important rights you have
19 are listed in NRS 645.680 through 645.990, NRS Chapter 233B, and NAC 645.810 through 645.920.

20 The purpose of the hearing is to determine if the RESPONDENT has violated NRS 645 or NAC
21 645 and if the allegations contained herein are substantially proven by the evidence presented and to

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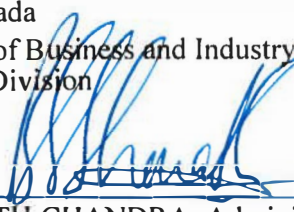
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1 further determine what administrative penalty, if any, is to be assessed against the RESPONDENT,
2 pursuant to NRS 645.235 or NRS 645.230.

3 DATED this 12 day of May, 2020.

4 State of Nevada
5 Department of Business and Industry
6 Real Estate Division

7 By: 
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11 AARON D. FORD
12 Attorney General

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