

FILED

NOV 12 2021

REAL ESTATE COMMISSION

BY *Suley Patel*

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Case No. 2021-424

Petitioner,

vs.

JULIE M. ROWELL,

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, Aaron D. Ford, Attorney General of the State of Nevada, and Virginia T. Tomova, Deputy Attorney General, hereby notifies RESPONDENT JULIE M. ROWELL ("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 645.630, NRS 645.995, 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 also held a property management permit. She 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. At all relevant times, RESPONDENT was licensed by the Division as a real estate
3 salesperson under licenses S.0174798 (in “inactive status”) and held a property management permit
4 from the Division under PM. 0167498 (in “inactive status”).

5 2. RESPONDENT’s broker was Manago Management, LLC-WindSun Realty Pacific
6 Group.

7 3. On or about November 25, 2020, the RESPONDENT entered into a guilty plea
8 agreement to reckless driving, category B felony (NRS 484B.653-NOC 53896) in the Eighth Judicial
9 District Court, Clark County, Nevada (Case No. C-20-352285-1).

10 4. The RESPONDENT had a prior misdemeanor DUI conviction on May 25, 2016 (Case
11 No. C288302).

12 5. A judgment of conviction (plea of guilty) was filed on February 2, 2021, sentencing the
13 RESPONDENT to a maximum of seventy-two (72) months with a minimum parole eligibility of
14 eighteen (18) months in the Nevada Department of Corrections (NDC).

15 6. On or about April 5, 2021, the RESPONDENT notified the Division from prison of her
16 felony conviction.

17 7. On or about April 29, 2021, the Division properly notified RESPONDENT, that it was
18 bringing a disciplinary action against her by filing a complaint before the Commission for a hearing.

19 **VIOLATIONS**

20 RESPONDENT has committed the following violations of law:

21 8. RESPONDENT’s Criminal Convictions violated NRS 645.633(1)(d)(2).

22 9. RESPONDENT violated NRS 645.615 (1) and (2) by failing to report her felony
23 conviction to the Division within ten (10) days after the conviction or entry of her plea of guilty.

24 **DISCIPLINE AUTHORIZED**

25 10. Pursuant to NRS 645.630 and NRS 645.633, the Commission is empowered to
26 impose an administrative fine per violation against RESPONDENT that may not exceed \$10,000, and
27 further to suspend, revoke or place conditions on the license of RESPONDENT.

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1 11. Additionally, under NRS Chapter 622, the Commission is authorized to impose costs
2 of the proceeding upon RESPONDENT, including investigative costs and attorney's fees, if the
3 Commission otherwise imposes discipline on RESPONDENT.

4 12. Therefore, the Division requests that the Commission take such disciplinary action as
5 it deems appropriate under the circumstances.

6 NOTICE OF HEARING

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

10 THE HEARING WILL TAKE PLACE on December 14, 2021, commencing at 9:00 a.m.,
11 or as soon thereafter as the Commission is able to hear the matter, and each day thereafter
12 commencing at 9:00 a.m. through December 16, 2021, or earlier if the business of the
13 Commission is concluded. The Commission meeting will be held on December 14, 2021, at the
14 Nevada State Business Center, 3300 West Sahara Avenue, 4th Floor – Nevada Room, Las Vegas,
15 Nevada 89102. The meeting will continue on December 15, 2021, at the Nevada State Business
16 Center, 3300 West Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102,
17 commencing at 9:00 a.m., and on December 16, 2021, should business not be concluded, starting
18 at 9:00 a.m. at the Nevada State Business Center, 3300 West Sahara Avenue, 4th Floor – Tahoe
19 Room, Las Vegas, Nevada 89102

20 STACKED CALENDAR: Your hearing is one of several hearings scheduled at the same
21 time as part of a regular meeting of the Commission that is expected to last from December 14,
22 2021, through December 16, 2021, or earlier if the business of the Commission is concluded.
23 Thus, your hearing may be continued until later in the day or from day to day. It is your
24 responsibility to be present when your case is called. If you are not present when your hearing is
25 called, a default may be entered against you and the Commission may decide the case as if all
26 allegations in the complaint were true. If you have any questions please call Evelyn Pattee,
27 Commission Coordinator (702) 486-4074.

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

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

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

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

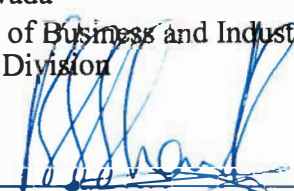
17 The purpose of the hearing is to determine if the RESPONDENT has violated NRS 645 or NAC
18 645 and if the allegations contained herein are substantially proven by the evidence presented and to

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1 further determine what administrative penalty, if any, is to be assessed against the RESPONDENT,
2 pursuant to NRS 645.630, NRS 645.633, NRS 645.235 or NRS 645.230.

3 DATED this 8 day of November, 2021.

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

7 By: 
8 SHARATH CHANDRA, Administrator
9 3300 West Sahara Avenue, Suite 350
10 Las Vegas, Nevada 89102

11 AARON D. FORD
12 Attorney General

13 By: / s / Virginia T. Tomova
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