

MAY 14 2021

**BEFORE THE REAL ESTATE COMMISSION**

**STATE OF NEVADA**

REAL ESTATE COMMISSION

BY *Evelyn Patta*

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

Case Nos. 2019-1388

**COMPLAINT AND NOTICE OF  
HEARING**

Petitioner,

vs.

JESSICA LYNN RAZZARI,

Respondent.

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 Peter Keegan, Deputy Attorney General, hereby notifies Respondent JESSICA LYNN RAZZARI ("Respondent") of an administrative hearing before the STATE OF NEVADA REAL ESTATE COMMISSION ("Commission"). The hearing will be held pursuant to Chapter 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 or other discipline, authorized by NRS 645 and/or NAC 645, if violations of law are proven.

**JURISDICTION**

Respondent engaged in activities, which require a license as a real estate broker, real estate broker-salesperson, or real estate salesperson, and/or a permit to engage in property management, issued by the Division, and is, therefore, subject to the jurisdiction of the Division and the Commission, and the provisions of NRS and NAC 645.

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## PROCEDURAL HISTORY

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2 1. On December 23, 2019, the Division received a complaint against Respondent  
3 from Chris Kauffman ("Complainant") regarding the property management services  
4 provided by the Respondent for the property located at 900 South Meadows Parkway #1812,  
5 Reno, Nevada 89521 ("Property").

6 2. On December 31, 2019, the Division sent Respondent an investigation-opening  
7 letter to her brokerage, via USPS certified mail delivery.

8 3. On January 2, 2020, the certified mailing of the investigation-opening letter  
9 was accepted by Taylor O' Daye at the Respondent's brokerage.

10 4. The Division received delivery confirmation of its investigation-opening letter  
11 USPS certified mailing on January 6, 2020.

12 5. The Division's investigation-opening letter required Respondent to submit a  
13 response to the facts alleged by the Complainant not later than January 14, 2020.

14 6. The Respondent emailed the Division on January 16, 2020, and requested  
15 mediation to resolve the complaint.

16 7. The Division responded to the Respondent's email and notified her that the  
17 Division does not offer mediation and that she was required to respond as directed in the  
18 investigation-opening letter dated December 31, 2019.

19 8. The Division extended the due date for the Respondent to provide a response  
20 until January 21, 2020.

21 9. On February 12, 2020, the Division sent a demand letter to the Respondent,  
22 via USPS certified mail, demanding she provide a response to the complaint not later than  
23 February 19, 2020.

24 10. On February 18, 2020, the Division received delivery confirmation that its  
25 demand letter was accepted by Erin Zunad on February 14, 2020.

26 11. On February 26, 2020, the Division sent RESPONDENT an NRS 233B letter  
27 indicating that the Division's investigation had obtained sufficient evidence to commence  
28

1 disciplinary action by filing a complaint with the Nevada Real Estate Commission  
2 (“Commission”).

3 12. As of the date of this Complaint and Notice of Hearing the Respondent has  
4 failed to provide a response to the Division regarding the complaint filed against her.

### 5 FACTUAL ALLEGATIONS

6 1. Respondent is a licensed Broker under license B.1001106.LLC and holds a  
7 Property Management Permit under permit PM.0163844.BKR.

8 2. Respondent was formerly the Broker of record for Own It Realty and Property  
9 Management LLC Brokerage; however, her license was revoked on May 10, 2021.

10 3. On August 4, 2019, the Respondent emailed the Complainant and asked if the  
11 Complainant would authorize repainting of the Property.

12 4. On August 9, 2019, the Respondent emailed the Complainant, stating she  
13 could have the Property repainted for \$800.00.

14 5. On September 12, 2019, the Respondent emailed the Complainant’s mother  
15 and stated that a tenant moved into the Property August 24, 2019.

16 6. On September 12, 2019, the Respondent emailed the Complainant’s mother  
17 and stated she was preparing “statements and payments this week and then we should be  
18 on track.”

19 7. On September 12, 2019, the Complainant’s mother emailed the Respondent,  
20 and stated it had “been a long time between incoming checks.

21 8. On October 2, 2019, the Complainant’s mother emailed the Respondent and  
22 asked “where August & September rent checks went?”

23 9. On October 2, 2019, the Respondent emailed the Complainant’s mother and  
24 stated she had changed banks and she would “check into it.”

25 10. On October 4, 2019, the Complainant’s mother emailed the Respondent and  
26 asked if the Respondent had heard from her bank about the missing rent checks.

27 11. On October 9, 2019, the Complainant emailed the Respondent and requested  
28 several documents and rents owed for August 2019, September 2019, and October 2019.





1 **TUESDAY, JUNE 15, 2021** Meeting number (Access code): 146 781 4940

2 Password (Attendee ID): MviU7hMsn35 (68487467635 from phones and video systems)

3 **WEDNESDAY, JUNE 16, 2021** Meeting number (Access code): 146 558 3491

4 Password (Attendee ID): EQvcxcSw628 (37829279628 from phones and video systems)

5 **THURSDAY, JUNE 17, 2021** Meeting number (Access code): 146 559 3429

6 Password (Attendee ID): BxHjvY3b33J (29458932335 from phones and video systems)

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8 If you do not have internet access, you may attend by phone at 1-844-621-3956  
9 using the access codes and attendee IDs listed above. Some mobile devices may ask  
10 attendees to enter a numeric attendee ID provided above. If Emergency Directive 006 is  
11 not extended and the meeting is held in person, then the meeting will be located at the  
12 following locations:

13 Nevada State Business Center  
14 Real Estate Division  
15 3300 West Sahara Avenue, Suite 350  
16 Las Vegas, NV 89102

17 If you would like an email containing this information, before the hearing, please  
18 contact Evelyn Pattee, Commission Coordinator, at (702) 486-4074 or [epattee@red.nv.gov](mailto:epattee@red.nv.gov).

19 **STACKED CALENDAR: Your hearing is one of several hearings scheduled**  
20 **at the same time as part of a regular meeting of the Commission that is expected**  
21 **to last from June 15 through June 17, 2021, but may end earlier if the business of**  
22 **the Commission is concluded. Thus, your hearing may be continued until later**  
23 **in the day or from day to day. It is your responsibility to be present when your**  
24 **case is called. If you are not present when your hearing is called, a default may**  
25 **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**  
27 **Evelyn Pattee Commission Coordinator (702) 486-4074.**

28 **YOUR RIGHTS AT THE HEARING:** except as mentioned below, the hearing is an  
open meeting under Nevada's open meeting law and may be attended by the public. After  
the evidence and arguments, the commission may conduct a closed meeting to discuss your

1 alleged misconduct or professional competence. A verbatim record will be made by a  
2 certified court reporter. You are entitled to a copy of the transcript of the open and closed  
3 portions of the meeting, although you must pay for the transcription.

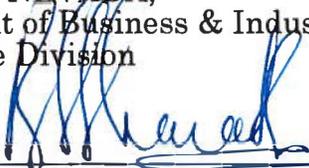
4 As the RESPONDENT you are specifically informed that, you have the right to  
5 appear and be heard in your defense, either personally or through your counsel of choice.  
6 At the hearing, the Division has the burden of proving the allegations in the complaint and  
7 will call witnesses and present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

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

16 The purpose of the hearing is to determine if the RESPONDENT has violated NRS  
17 645 and/or NAC 645 and if the allegations contained herein are substantially proven  
18 by the evidence presented and to further determine what administrative penalty, if any, is  
19 to be assessed against the RESPONDENT.

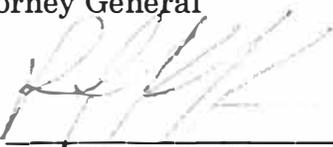
20  
21 DATED this 11 day of May 2021.

22 STATE OF NEVADA,  
23 Department of Business & Industry  
24 Real Estate Division

25 By:   
26 SHARATH CHANDRA  
27 Administrator  
28 3300 W. Sahara Avenue, Ste. 350  
Las Vegas, Nevada 89102

DATED this 11th day of May 2021.

AARON D. FORD  
Attorney General

By:   
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*Attorneys for the Real Estate Division*