



1           2. At all relevant times, RESPONDENT was a manager and broker for Addicted Realty LLC, a  
2 Nevada limited liability company (“Addicted Realty”). [Ex. A, Bates No NRED 1; Ex. C, Bates No.  
3 NRED 10-11].

4           3. Addicted Realty is a real estate brokerage and provides property management services.

5           4. George Anderson III (“Anderson”) is also listed as a manager of Addicted Realty according to  
6 the Nevada Secretary of State’s records. [Ex. C, Bates No. NRED 10-11].

7           5. Anderson is licensed by the Division as a broker with the Division under licenses  
8 B.1001398.LLC and B.1001399.INDV. [Ex. A, Bates No. NRED 4].

9           6. Anderson also held property management permits from the Division, however, said property  
10 management permits were revoked by the Commission’s order effective August 5, 2021. [Ex B., Bates  
11 No. NRED 5-8].

12           7. The Division began its investigation after Addicted Realty failed to submit its trust account  
13 reconciliations to the Division for 2019, 2020, and 2021.

14           8. As background, on August 1, 2019, the Division notified Anderson that he had failed to submit  
15 his June 2019 trust account reconciliations to the Division as required by NRS 645.310(5) pursuant to  
16 NAC 645.805(3), requested that Anderson also pay a fine in the amount of \$1,000.00 (“Fine”), and remit  
17 his trust account reconciliations to the Division by September 3, 2019. [See Ex. B, Bates No. NRED 6].

18           9. On September 3, 2019 Anderson paid the Fine but failed to submit the 2019 trust account  
19 reconciliations to the Division. [See Ex. B, Bates No. NRED 6].

20           10. The Division then filed a complaint against Anderson to be heard by the Commission at  
21 its meeting beginning on December 7, 2020, regarding Anderson’s failure to submit the trust account  
22 reconciliations to the Division.

23           11. Despite the Commission’s continuing Anderson’s hearing multiple times and  
24 RESPONDENT retaining legal counsel, Anderson failed to appear at the hearing personally, or through  
25 legal counsel, such that the Commission entered its Findings of Fact, Conclusions of Law, and Order by  
26 default (“Default Order”) against Anderson on July 6, 2021. [See Ex. B, Bates No. NRED 5-8].

27           12. The Default Order fined Anderson \$10,000.00, ordered him to pay the Division’s costs in the  
28 amount of \$738.72, and ordered that all property management permits held by him be revoked.

1 [Ex. B, Bates No. NRED 7].

2 13. On December 27, 2021, the Division properly notified RESPONDENT that it had opened an  
3 investigation against him regarding Addicted Realty's trust accounts and requested that RESPONDENT  
4 provide copies of documents from April 2020 to June of 2020 including the following: (1) residential  
5 management agreements, (2) owners statements, (3) residential lease agreements, (4) tenant ledgers, (5)  
6 a sworn affidavit, and (6) an explanation regarding why his name appeared on certain bank account  
7 signature cards for Addicted Realty, when he had submitted a Form 546A to the Division for 2019 and  
8 2021, stating that he was not handling any funds ("Requested Documents"). [Ex. D, Bates No. NRED  
9 13-14].

10 14. After receiving no response from RESPONDENT, on or around June 10, 2021, the Division  
11 sent a subsequent letter to RESPONDENT, again asking for the Requested Documents [Ex. E, Bates No.  
12 NRED 15-16].

13 15. RESPONDENT failed to timely respond to the Division's follow-up letter.

14 16. As part of its investigation, the Division subpoenaed Addicted Realty's bank account records  
15 from Bank of America. [Ex. F, Bates No. 80-82].

16 17. Bank of America produced certain bank records responsive to the Division's subpoena [See  
17 Ex. F, Bates No.].

18 18. Bank records were produced for an account ending in 8424, which is one of Addicted  
19 Realty's brokerage accounts. [See, e.g., Ex. F].

20 19. Bank records were produced for an account ending in 8780, which is also one of Addicted  
21 Realty's brokerage accounts. [See, e.g., Ex. F].

22 20. Bank records were produced for an account ending in 9663, which is Addicted Realty's  
23 short-term rental trust account ("Short-term Rental Trust Account"). [See, e.g., Ex. F].

24 21. Bank records were produced for an account ending in 8437, which is Addicted Realty's  
25 property management operating rental trust account ("Operating Rental Trust Account"). [See, e.g., Ex.  
26 F].

27 22. Bank records were produced for an account ending in 8440, which is Addicted Realty's  
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1 property management security deposit trust account (“Security Deposit Trust Account”). [*See, e.g.*, Ex.  
2 F].

3 23. Both RESPONDENT and Anderson are listed as the only signatories on the accounts set forth  
4 in Paragraphs 18-22. [*See, e.g.*, Ex. F].

5 24. Addicted Realty’s bank account records showed that in April, May, and June of 2020,  
6 approximately \$18,095.00 was transferred from Addicted Realty’s brokerage account ending in 8780  
7 into the Short-term Rental Trust Account. [*See, e.g.*, Ex. F].

8 25. By transferring and/or permitting the transfer of money from Addicted Realty’s brokerage  
9 account into the Short-term Rental Trust Account, RESPONDENT improperly co-mingled money.

10 26. In June of 2020, approximately \$5,667.67 was transferred from Addicted Realty’s Operating  
11 Rental Trust Account into the Short-term Rental Trust Account. [[*See, e.g.*, Ex. F].

12 27. By transferring this money and/or permitting this transfer from Addicted Realty’s Operating  
13 Rental Trust Account into Addicted Realty’s Short-term Rental Trust Account, RESPONDENT  
14 improperly co-mingled money.

15 28. In June of 2020, approximately \$3,000.00 was transferred from Addicted Realty’s Short-term  
16 Rental Trust Account into its business brokerage account ending in 8780. [*See, e.g.*, Ex. F].

17 29. By transferring and/or permitting this transfer, RESPONDENT improperly co-mingled money  
18 between Addicted Realty’s Short-Term Rental Trust Account and its business brokerage account.

19 30. In June of 2020, approximately \$5,000.00 was transferred from Addicted Realty’s business  
20 brokerage account ending in 8780 into the Operating Rental Trust Account. [*See, e.g.*, Ex. F].

21 31. By transferring and/or permitting the transfer of these funds, RESPONDENT improperly co-  
22 mingled money between Addicted Realty’s business brokerage account and its Operating Rental Trust  
23 Account.

24 32. In April, May and June of 2020, approximately \$64,000.00 was transferred from Addicted  
25 Realty’s business brokerage account ending in 8780 to its Operational Rental Trust Account. [*See, e.g.*,  
26 Ex. F].

27 33. By transferring and/or permitting the transfer of this money, RESPONDENT improperly co-  
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1 mingled money between Addicted Realty's business brokerage account and its Operational Rental Trust  
2 Account.

3 34. In April and May of 2020, approximately \$55,000.00 was transferred from Addicted Realty's  
4 Operating Rental Trust Account to its business brokerage account ending in 8780. [See, e.g., Ex. F].

5 35. By transferring and/or permitting said transfer, RESPONDENT improperly co-mingled  
6 money between Addicted Realty's Operating Rental Trust Account and its business brokerage account.

7 36. On June 12, 2020, approximately \$2,200.00 in cash was withdrawn from Addicted  
8 Realty's Operating Rental Trust Account. [See, e.g., Ex. F].

9 37. By making and/or permitting a cash withdrawal, RESPONDENT co-mingled Addicted  
10 Realty's Operating Rental Trust Account with personal funds.

11 38. In April of 2020, approximately \$3,000.00 was transferred from Addicted Realty's Security  
12 Deposit Trust Account to its business brokerage account ending in 8780. [See, e.g., Ex. F].

13 39. By transferring/and or permitting this transfer, RESPONDENT improperly co-mingled money  
14 between Addicted Realty's Security Deposit Trust Account and its business brokerage account.

15 40. On approximately June 10, 2021, the Division's investigator emailed RESPONDENT,  
16 enclosing the Division's follow-up letter and requested a response and the Requested Documents. [Ex.  
17 H, Bates No. NRED 243].

18 41. In response, RESPONDENT stated, "I'm not sure how I missed this, but will start getting this  
19 over to you ASAP." [Ex. H, Bates No. NRED 243].

20 42. On or around June 21, 2021, the Division properly notified RESPONDENT that it was bringing  
21 a complaint against him for disciplinary action to be heard by the Nevada Real Estate Commission. [Ex.  
22 G, Bates No. NRED 241-42].

23 43. On or about July 10, 2022, RESPONDENT signed a sworn declaration submitted to the  
24 Division regarding another case against him- Case No. 2021-1227- and also provided certain documents  
25 to the Division in his response.

26 44. The documents RESPONDENT provided to the Division included, among other things, a  
27 residential property management agreement dated July 16, 2019, a copy of a tenant check dated August  
28 18, 2021, a lease agreement dated August 17, 2021, a lease agreement dated July 2, 2020, a lease

1 agreement dated August 26, 2019, a security deposit transmittal dated April 24, 2020, and owners'  
2 statements from 2019, 2020, and 2021.

3 45. On or around July 29, 2022, RESPONDENT provided additional documents to the Division,  
4 including leases, property management agreements, owners statements, and tenant ledgers for properties  
5 Addicted Realty managed. [See Ex. I, Bates No. NRED 246].

6 46. RESPONDENT also submitted an affidavit to the Division stating that with respect to  
7 Addicted Realty's bank accounts ending in 8440, 8437, and 9663, that he filed a 546A form for the years  
8 2019 and 2021, claiming that he did so because he did not handle the money in those accounts and was  
9 only listed on Addicted Realty's bank's signature cards, "strictly as a back up in case something happened  
10 to George Anderson." [Ex. I, Bates No. NRED 247].

### 11 VIOLATIONS OF LAW

12 1. RESPONDENT violated NRS 645.310(3) by comingling and/or permitting the co-mingling of  
13 money or other property of a client on multiple occasions by improperly transferring and/or permitting  
14 the transfer of money from the accounts as set forth in Paragraphs 24 to 39 of this Complaint.

15 2. RESPONDENT violated NRS 645.630(1)(h) by comingling and/or permitting the co-mingling  
16 of money of his own or converting the money of others to his own, on multiple occasions by improperly  
17 transferring and/or permitting the transfer of money from accounts as set forth in Paragraphs 24 to 39 of  
18 this Complaint.

19 3. RESPONDENT violated NRS 645.630(1)(f) by failing, within a reasonable time, to account  
20 for or to remit any money which comes into his possession which belongs to others.

21 4. RESPONDENT violated NRS 645.630(1)(e) by failing to maintain for review and audit by the  
22 Division, each brokerage agreement and property management agreement.

23 5. RESPONDENT violated NRS 645.630(1)(g) by failing to balance the trust account at least  
24 monthly and by failing to submit to the Division an annual accounting of the trust accounts on multiple  
25 occasions.

26 6. RESPONDENT violated NRS 645.633(1)(h) pursuant to NAC 645.605(6) by breaching his  
27 obligation of absolute fidelity to his principal's interest.

28 7. RESPONDENT violated NAC 645.655(2) by failing to produce documents which a broker is

1 required to keep complete real estate transaction and property management records for.

2 8. RESPONDENT violated NAC 645.806(1) by failing to turn Addicted Realty's annual trust  
3 account reconciliations into the Division on multiple occasions.

#### 4 **DISCIPLINE AUTHORIZED**

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

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

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

#### 13 **NOTICE OF HEARING**

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

17 **THE HEARING WILL TAKE PLACE on September 27, 2022, commencing at 9:00 a.m.,**  
18 **or as soon thereafter as the Commission is able to hear the matter, and each day thereafter**  
19 **commencing at 9:00 a.m. through September 29, 2022, or earlier if the business of the Commission**  
20 **is concluded. The Commission meeting will be held on September 27, 2022, at the Nevada State**  
21 **Business Center, 3300 West Sahara Avenue, 4<sup>th</sup> Floor – Nevada Room, Las Vegas, Nevada 89102.**  
22 **The meeting will continue on September 28, 2022, at the Nevada State Business Center, 3300 West**  
23 **Sahara Avenue, 4<sup>th</sup> Floor – Nevada Room, Las Vegas, Nevada 89102, commencing at 9:00 a.m.,**  
24 **and on September 29, 2022, should business not be concluded, starting at 9:00 a.m. at the Nevada**  
25 **State Business Center, 3300 West Sahara Avenue, 4<sup>th</sup> Floor – Nevada Room, Las Vegas, Nevada**  
26 **89102.**

27 **STACKED CALENDAR: Your hearing is one of several hearings scheduled at the same**  
28 **time as part of a regular meeting of the Commission that is expected to last from September 27,**

1 2022 through September 29, 2022, or earlier if the business of the Commission is concluded. Thus,  
2 your hearing may be continued until later in the day or from day to day. It is your responsibility  
3 to be present when your case is called. If you are not present when your hearing is called, a default  
4 may be entered against you and the Commission may decide the case as if all allegations in the  
5 complaint were true. If you have any questions please call Shareece Bates, Administration Section  
6 Manager, at (702) 486-4036.

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

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

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


22 The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or NAC  
23 645 and if the allegations contained herein are substantially proven by the evidence presented and  
24 to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,  
25 pursuant to NRS 645.235, 645.633 and or 645.630.

26 DATED this 15 day of August, 2022.

27 State of Nevada  
28 Department of Business and Industry  
Real Estate Division



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