

1 BEFORE THE REAL ESTATE COMMISSION

2 STATE OF NEVADA

3 SHARATH CHANDRA, Administrator,  
4 REAL ESTATE DIVISION, DEPARTMENT  
5 OF BUSINESS & INDUSTRY,  
6 STATE OF NEVADA,

7 Petitioner,

8 vs.

9 MARSHALL CARRASCO,  
10 (B.1000579.INDV)

11 Respondent.

Case No. 2021-1122

**FILED**

MAR 28 2023

REAL ESTATE COMMISSION

BY Kelly Valadez

12 **COMPLAINT AND NOTICE OF HEARING**

13 The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY  
14 OF THE STATE OF NEVADA (“Division”) hereby notifies RESPONDENT MARSHALL  
15 CARRASCO (“RESPONDENT”) of an administrative hearing before the STATE OF NEVADA REAL  
16 ESTATE COMMISSION (“Commission”). The hearing will be held pursuant to Chapters 233B and  
17 Chapter 645 of the Nevada Revised Statutes (“NRS”) and Chapter 645 of the Nevada Administrative  
18 Code (“NAC”). The purpose of the hearing is to consider the allegations stated below and to determine  
19 if the RESPONDENT should be subject to an administrative penalty as set forth in NRS 645.630 and/or  
20 NRS 622.400, and the discipline to be imposed, if violations of law are proven.

21 **JURISDICTION**

22 RESPONDENT, at all relevant times mentioned in this Complaint, was actively licensed as a  
23 Broker under license number B.1000579.INDV. RESPONDENT is, therefore, subject to the jurisdiction  
24 of the Division and the Commission, and the provisions of NRS chapter 645 and NAC chapter 645.

25 **FACTUAL ALLEGATIONS**

26 1. At all times relevant to this Complaint, RESPONDENT was the listing agent for  
27 Complainant’s real property located at 2219 Kadden, Dayton, Nevada 89403 (the “Property”). *NRED*  
28 *000033 – 000036.*

2. On or about September 2, 2021, RESPONDENT’S agent, Tyler Richardson, met with the  
Complainant in person to sign an Exclusive Right to Sell Contract for the Property. *NRED 000069.*

1           3.       On April 4, 2022, in an email to the Division, RESPONDENT admitted his agent, Mr.  
2 Richardson, met Complainant to sign the Exclusive Right to Sell Contract. *NRED 000006.*

3           4.       Yet, the Exclusive Right to Sell Contract was executed electronically. *NRED 000033 –*  
4 *000036.*

5           5.       On June 7, 2022, RESPONDENT represented to the Division that his agent, Mr.  
6 Richardson, was an active licensee at all times relevant. *NRED 000020 – 000021.*

7           6.       But, RESPONDENT’S agent, Tyler Richardson, did not have an active license when he  
8 met with the Complainant to sign the Exclusive Right to Sell Contract. *NRED 000004.*

9           7.       On October 6, 2021, RESPONDENT’S inactive licensee, Mr. Richardson, emailed  
10 Complainant listing information for comparables. *NRED 000064.*

11          8.       On November 23, 2021, RESPONDENT’S inactive licensee, Mr. Richardson, emailed  
12 Complainant listing information and links. *NRED 000073.*

13          9.       But, RESPONDENT’S agent, Mr. Richardson, did not have an active license when he  
14 emailed Complainant listing information. *NRED 000004.*

15          10.      On or about September 2, 2021, the Complainant signed a Duties Owed by a Nevada Real  
16 Estate Licensee (the “Duties Owed”). *NRED 000037.*

17          11.      The Duties Owed only identified RESPONDENT as the licensee in the real estate  
18 transaction. *NRED 000037.*

19          12.      A Supplemental List of Licensees Party to the Duties Owed was not included.

20          13.      From about September 28, 2021, to October 28, 2021, RESPONDENT’S licensee, Brylle  
21 Ireland, sent numerous emails to Complainant regarding the Property transaction. *NRED 000028 –*  
22 *000063, and NRED 000065 – 000072.*

23          14.      During which, on October 11, 2021, RESPONDENT’S licensee, Ms. Ireland, emailed  
24 Complainant details of an offer to purchase the Property. *NRED 000065 – 000066.*

25          15.      But, RESPONDENT’S licensee, Ms. Ireland, was not included on a Supplemental List of  
26 Licensees Party to the Duties Owed.



1 Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102. The meeting will continue  
2 on each day thereafter commencing at 9:00 a.m. through May 4, 2023, at the Nevada State Business  
3 Center, 3300 West Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102, until the  
4 business of the Commission is concluded. To attend the Commission meeting virtually or by  
5 telephone, go to Webex.com or dial 1-844-621-3956 and enter the meeting information below:  
6

7 **TUESDAY, MAY 2, 2023**

8 1-844-621-3956 ACCESS CODE/MEETING NUMBER: 2498 351 9155##

9 WEBEX.COM MEETING NUMBER: 2498 351 9155 MEETING PASSWORD: Td4KAXu9A3n

10 **WEDNESDAY, MAY 3, 2023**

11 1-844-621-3956 ACCESS CODE/MEETING NUMBER: 2494 419 1083##

12 WEBEX.COM MEETING NUMBER: 2494 419 1083 MEETING PASSWORD: Z8Gj6VJH8W3

13 **THURSDAY, MAY 4, 2023**

14 1-844-621-3956 ACCESS CODE/MEETING NUMBER: 2482 634 9998##

15 WEBEX.COM MEETING NUMBER: 2482 634 9998 MEETING PASSWORD: uxWgkUka243

16  
17 **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at the same  
18 time as part of a regular meeting of the Commission that is expected to last from May 2, 2023  
19 through May 4, 2023, or earlier if the business of the Commission is concluded. Thus, your hearing  
20 may be continued until later in the day or from day to day. It is your responsibility to be present  
21 when your case is called. If you are not present when your hearing is called, a default may be  
22 entered against you and the Commission may decide the case as if all allegations in the complaint  
23 were true. If you have any questions, please call Kelly Valadez, Commission Coordinator, at (702)  
24 486-4606.

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

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

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

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

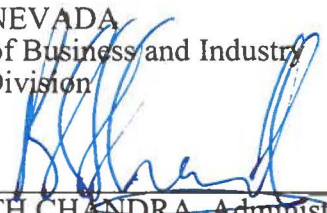
13 The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or NAC  
14 645 and if the allegations contained herein are substantially proven by the evidence presented and  
15 to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,  
16 pursuant to NRS 645.235, 645.633 and or 645.630.

17 DATED this 20 day of March 2023.

DATED this 9<sup>th</sup> day of March 2023.

18  
19 STATE OF NEVADA  
20 Department of Business and Industry  
Real Estate Division

AARON D. FORD  
Attorney General

21 By:   
22 SHARATH CHANDRA, Administrator  
23 CHARVEZ FOGER, Deputy Administrator  
24 3300 West Sahara Avenue, Suite 350  
Las Vegas, Nevada 89102

By:   
25 CHRISTAL P. KEEGAN, ESQ.  
26 Deputy Attorney General  
27 Bar No. 12725  
28 5420 Kietzke Lane #202  
Reno, Nevada 89511  
(775) 687-2141  
[ckeegan@ag.nv.gov](mailto:ckeegan@ag.nv.gov)  
Attorney for Real Estate Division