

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 JULES MITCHELL LEHR,
10 (S.0174507 - REVOKED)

11 Respondent.

Case No. 2022-884

FILED

JUL 07 2023

REAL ESTATE COMMISSION

BY Kelley 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 JULES MITCHELL
15 LEHR ("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 645.235(2)
20 and/or 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, held himself out and/or
23 otherwise performed acts as a person required to have a license while his salesperson license (S.0174507)
24 was revoked. RESPONDENT is, therefore, subject to the jurisdiction of the Division and the
25 Commission, and the provisions of NRS chapter 645 and NAC chapter 645.

26 **FACTUAL ALLEGATIONS**

27 1. On December 30, 2021, as so ordered by the Commission, the Division revoked the
28 Respondent's real estate salesperson license number S.0174507. *NRED 000004.*

...

1 2. Prior to the Respondent's revocation, he was associated with Sin City Realty, LLC.
2 *NRED 000005.*

3 3. After the Respondent's license had been revoked, the Division received information that
4 the Respondent continued to be directly involved with the real property located at 9363 Pinnacle Cove,
5 Las Vegas. *NRED 000007.*

6 4. Furthermore, the Division received information that the Respondent was actively
7 advertising properties for rent, sale or both even though his license was revoked. *NRED 000007.*

8 5. On or about December 2, 2022, the unlicensed Respondent advertised the real property
9 located at 808 Hamlet for sale. *NRED 000089 – 000092.*

10 6. The Respondent did not own the Hamlet Property. *NRED 000093 – 000094.*

11 7. On or about December 3, 2022, the unlicensed Respondent advertised the real property
12 located at 4980 Mountain Creek "for sale or rent or both". *NRED 000084 – 000088.*

13 8. But the Respondent did not own the Mountain Creek Property. *NRED 000077.*

14 9. On or about December 4, 2022, the unlicensed Respondent advertised a liberty model
15 home with a detached casita for sale. *NRED 000095.*

16 10. On or about December 14, 2022, the unlicensed Respondent advertised the real property
17 located at 2808 Karen Avenue which stated: "Private owner, no property manager games."
18 *NRED 000066.*

19 11. The Respondent did not own the Karen Avenue property, either. *NRED 000069.*

20 12. On or about December 22, 2022, the Division requested the Respondent provide a
21 response and information by January 4, 2023. *NRED 000007.*

22 13. Thereafter, on or about December 23, 2022, the Division ordered the Respondent to Cease
23 and Desist from performing unlicensed real estate activities. *NRED 000012 – 000014.*

24 14. The Respondent refused to accept the Division's Cease and Desist. *NRED 000015,*
25 *NRED 000021.*

26 15. By January 4, 2023, the Respondent did not respond to the Division's request for a
27 response and information. *NRED 000028.*

28 ...

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

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

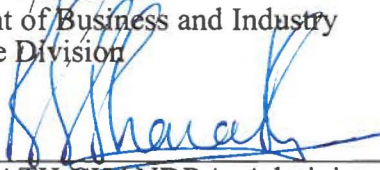
11 The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or NAC
12 645 and if the allegations contained herein are substantially proven by the evidence presented and
13 to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,
14 pursuant to NRS 645.235, 645.633 and or 645.630.


15 DATED this 6 day of July 2023.

DATED this 6th day of July 2023.

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

AARON D. FORD
Attorney General

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