1 BEFORE THE REAL ESTATE COMMISSION 2 STATE OF NEVADA 3 SHARATH CHANDRA, Administrator, REAL ESTATE DIVISION, DEPARTMENT Case No. 2022-884 4 OF BUSINESS & INDUSTRY, STATE OF NEVADA, 5 Petitioner. 6 VS. 7 JUL 0 7 2023 JULES MITCHELL LEHR, 8 (S.0174507 - REVOKED) **REAL ESTATE COMMISSION** Valad 9 Respondent. 10 COMPLAINT AND NOTICE OF HEARING 11 The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY 12 13 OF THE STATE OF NEVADA ("Division") hereby notifies RESPONDENT JULES MITCHELL LEHR ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL 14 ESTATE COMMISSION ("Commission"). The hearing will be held pursuant to Chapters 233B and 15 Chapter 645 of the Nevada Revised Statutes ("NRS") and Chapter 645 of the Nevada Administrative 16 Code ("NAC"). The purpose of the hearing is to consider the allegations stated below and to determine 17 if the RESPONDENT should be subject to an administrative penalty as set forth in NRS 645.235(2) 18 19 and/or NRS 622.400, and the discipline to be imposed, if violations of law are proven. **JURISDICTION** 20 RESPONDENT, at all relevant times mentioned in this Complaint, held himself out and/or 21 otherwise performed acts as a person required to have a license while his salesperson license (S.0174507) 22 RESPONDENT is, therefore, subject to the jurisdiction of the Division and the 23 24 Commission, and the provisions of NRS chapter 645 and NAC chapter 645. 25 **FACTUAL ALLEGATIONS** 26 1. On December 30, 2021, as so ordered by the Commission, the Division revoked the 27 Respondent's real estate salesperson license number S.0174507. NRED 000004. 28

- Prior to the Respondent's revocation, he was associated with Sin City Realty, LLC.
 NRED 000005.
- 3. After the Respondent's license had been revoked, the Division received information that the Respondent continued to be directly involved with the real property located at 9363 Pinnacle Cove, Las Vegas. *NRED 000007*.
- 4. Furthermore, the Division received information that the Respondent was actively advertising properties for rent, sale or both even though his license was revoked. *NRED 000007*.
- 5. On or about December 2, 2022, the unlicensed Respondent advertised the real property located at 808 Hamlet for sale. *NRED* 000089 000092.
 - 6. The Respondent did not own the Hamlet Property. NRED 000093 000094.
- 7. On or about December 3, 2022, the unlicensed Respondent advertised the real property located at 4980 Mountain Creek "for sale or rent or both". *NRED 000084 000088*.
 - 8. But the Respondent did not own the Mountain Creek Property. NRED 000077.
- 9. On or about December 4, 2022, the unlicensed Respondent advertised a liberty model home with a detached casita for sale. *NRED 000095*.
- 10. On or about December 14, 2022, the unlicensed Respondent advertised the real property located at 2808 Karen Avenue which stated: "Private owner, no property manager games." NRED 000066.
 - 11. The Respondent did not own the Karen Avenue property, either. NRED 000069.
- 12. On or about December 22, 2022, the Division requested the Respondent provide a response and information by January 4, 2023. *NRED 000007*.
- 13. Thereafter, on or about December 23, 2022, the Division ordered the Respondent to Cease and Desist from performing unlicensed real estate activities. *NRED 000012 000014*.
- 14. The Respondent refused to accept the Division's Cease and Desist. NRED 000015, NRED 000021.
- 15. By January 4, 2023, the Respondent did not respond to the Division's request for a response and information. *NRED 000028*.

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

NOTICE OF HEARING

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

THE HEARING WILL TAKE PLACE on August 22, 2023, commencing at 9:00 a.m., or as soon thereafter as the Commission is able to hear the matter, and each day thereafter commencing at 9:00 a.m. through August 24, 2023, or earlier if the business of the Commission is concluded. The Commission meeting will be held on August 22, 2023, at the Nevada Division of Insurance, 1818 E. College Parkway, Suite 103, Carson City, Nevada 89706, with video conference to the Nevada State Business Center 3300 West Sahara Avenue, 4th Floor, Nevada Room, Las Vegas, Nevada 89102. The meeting will continue on each day thereafter commencing at 9:00 a.m. through August 24, 2023 until the business of the Commission is concluded.

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

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 alleged misconduct or professional competence. You are entitled to a copy of the transcript of the open and closed portions of the meeting, although you must pay for the transcription.

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

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

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

DATED this 6 day of July 2023.

DATED this 6th day of July 2023.

STATE OF NEVADA

Department of Business and Industry

Real Estate Division

By:

SHARATH CHANDRA, Administrator CHARVEZ FOGER, Deputy Administrator 3300 West Sahara Avenue, Suite 350 Las Vegas, Nevada 89102

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AARON D. FORD Attorney General

By: epkeegan

CHRISTAL P. KEEGAN, Bar No. 12725 Deputy Attorney General 5420 Kietzke Lane, #202 Reno, Nevada 89511

(775) 687-2141

ckeegan@ag.nv.gov

Attorney for Real Estate Division