

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 NATHAN VIDRINE,
(B.1000599.INDV, B.1000624.LLC,
10 PM.0164569.BKR, PM.0165702.BKR)

11 Respondent.

Case No. 2021-1192

FILED

MAR 17 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 NATHAN VIDRINE
15 (“RESPONDENT”) of an administrative hearing before the STATE OF NEVADA REAL ESTATE
16 COMMISSION (“Commission”). The hearing will be held pursuant to Chapters 233B and Chapter 645
17 of the Nevada Revised Statutes (“NRS”) and Chapter 645 of the Nevada Administrative Code (“NAC”).
18 The purpose of the hearing is to consider the allegations stated below and to determine if the
19 RESPONDENT should be subject to an administrative penalty as set forth in NRS 645.235, NRS 645.630
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, was actively licensed as a
23 Broker under license numbers B.1000599.INDV and B.1000624.LLC, as a Property Manager under
24 license numbers PM.0164569.BKR, and PM.0165702.BKR. RESPONDENT is, therefore, subject to the
25 jurisdiction of the Division and the Commission, and the provisions of NRS chapter 645 and NAC chapter
26 645.

27 **FACTUAL ALLEGATIONS**

28 1. At all times relevant to this Complaint, RESPONDENT was associated with Turn Key
Property Solutions (“Turn Key”). NRED 000002 – NRED 000003.

1 2. On or about February 9, 2021, Turn Key accepted a deposit (\$3,323.00) to lease the
2 property located at 7876 Crownbeard Street, Las Vegas, Nevada 89149 (the "Property"). *NRED 000048.*

3 3. Turn Key's unlicensed assistant "Lourdes R." signed the Security Deposit Agreement.
4 *NRED 000083.*

5 4. On February 12, 2021, RESPONDENT represented a one-year Residential Lease
6 Agreement for the Property between Complainant/Tenant and the owner. *NRED 000031 – 000045.*

7 5. The Residential Lease Agreement provided a monthly rental rate of \$1,450.00 and a
8 security deposit of \$1,650.00. *NRED 000032.*

9 6. On July 15, 2021, during the lease term, Turn Key issued Complainant a 45-Day Notice
10 of Increased Rent ("Notice of Increased Rent") which included an option to vacate the property. *NRED*
11 *000046.*

12 7. On July 29, 2021, in response to the Notice of Increased Rent, Complainant asked
13 RESPONDENT if the Owner would go for a lower rental increase amount. *NRED 000029 – 000030.*

14 8. On July 30, 2021, not RESPONDENT, but his unlicensed assistant "Lourdes" responded
15 to Complainant's email. *NRED 000029 – 000030.*

16 9. On July 31, 2021, Complainant emailed Turn Key his 30-day notice to vacate ending on
17 August 31, 2021. *NRED 000029 – 000030.*

18 10. It was not until August 2, 2021, that not RESPONDENT, but his unlicensed assistant
19 "Ally Alvarez" informed Complainant the Notice of Increased Rent was sent in error and to let her know
20 "if you will still be moving out or continue with your lease". *NRED 000029, and NRED 000028.*

21 11. On August 18, 2021, Complainant emailed Turn Key stating he will still be vacating the
22 property as he previously emailed. *NRED 000029.*

23 12. RESPONDENT'S ledger regarding Complainant's tenancy for the Property indicated an
24 Active End date of August 31, 2021. *NRED 000109.*

25 13. Yet, after the Active End date, RESPONDENT indicated Complainant forfeited his
26 security deposit and assessed charges for the remainder of the lease term. *NRED 0000109 – 000110.*

27 14. Complainant alleged he left the home in pristine condition. *NRED 000028.*

28

1 YOUR RIGHTS AT THE HEARING: except as mentioned below, the hearing is an open meeting
2 under Nevada's open meeting law, and may be attended by the public. After the evidence and arguments,
3 the commission may conduct a closed meeting to discuss your alleged misconduct or professional
4 competence. A verbatim record will be made by a certified court reporter. You are entitled to a copy of
5 the transcript of the open and closed portions of the meeting, although you must pay for the transcription.

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

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

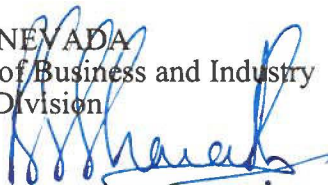
16 The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or NAC
17 645 and if the allegations contained herein are substantially proven by the evidence presented and
18 to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,
19 pursuant to NRS 645.235, 645.633 and or 645.630.


20 DATED this 16 day of March 2023.

DATED this 13th day of March 2023.

22 STATE OF NEVADA
23 Department of Business and Industry
Real Estate Division

AARON D. FORD
Attorney General

24 By: 
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