

BEFORE THE REAL ESTATE COMMISSION
STATE OF NEVADA

SHARATH CHANDRA, Administrator,
REAL ESTATE DIVISION, DEPARTMENT
OF BUSINESS & INDUSTRY,
STATE OF NEVADA,

Petitioner,

vs.

FRED GLICK,

Respondent.

Case No. 2021-819

FILED

MAR 27 2023

REAL ESTATE COMMISSION

BY Kelley Valadez

COMPLAINT AND NOTICE OF HEARING

The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY OF THE STATE OF NEVADA ("Division") hereby notifies RESPONDENT FRED GLICK ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL ESTATE COMMISSION ("Commission"). The hearing will be held pursuant to Chapters 233B and Chapter 645 of the Nevada Revised Statutes ("NRS") and Chapter 645 of the Nevada Administrative Code ("NAC"). The purpose of the hearing is to consider the allegations stated below and to determine if the RESPONDENT should be subject to an administrative penalty as set forth in NRS 645.235 and/or NRS 622.400, and the discipline to be imposed, if violations of law are proven.

JURISDICTION

RESPONDENT, at all relevant times mentioned in this Complaint, held himself out and/or otherwise performed acts as a person licensed as a Broker/Salesperson, and/or property manager permit holder, in the State of Nevada. RESPONDENT is, therefore, subject to the jurisdiction of the Division and the Commission, and the provisions of NRS chapter 645 and NAC chapter 645.

FACTUAL ALLEGATIONS

1. At all times relevant to this Complaint, RESPONDENT did not hold a real estate license and/or property manager permit in the State of Nevada. *NRED 000003.*

2. At all times relevant, RESPONDENT held a California broker's license. *NRED 000007 - 000008.*

1 3. At all times relevant, RESPONDENT was the Broker and Vice President of Real Estate
2 for Onerent, Inc. dba Poplar Homes. *NRED 000004 – 000008, and NRED 000060.*

3 4. The RESPONDENT’S website advertised that it provided the most advanced property
4 management for a fee in Las Vegas, Nevada. *NRED 000019 - 000020, NRED 000023, NRED 000026 -*
5 *000027, NRED 000036, and NRED 000060.*

6 5. The RESPONDENT’s website continued to include the license number of a Nevada
7 Broker named in another disciplinary matter (Case No. 2021-818), Mr. Sean Marshall
8 (REDNV#B.0143569). *NRED 000038, and NRED 000002.*

9 6. Poplar Homes is not licensed to do property management in Nevada. *NRED 000004,*
10 *NRED 000053, NRED 000037 – 000038, and NRED 000060.*

11 7. On or about July 20, 2021, a fully executed Renewal Addendum for Residential Lease
12 Agreement for the real property located at 1371 Airglow Ct., Henderson, NV 89014 (the “Property”),
13 provided Marshall Stearns Real Estate as Manager. *NRED 000054.*

14 8. On or about July 27, 2021, Mr. Marshall’s Brokerage, assigned property management
15 services for the Property to RESPONDENT’S company Poplar Homes. *NRED 000055.*

16 9. In a letter dated August 2, 2021, Complainant requested termination of property
17 management services for the Property because she did not authorize the transfer from Mr. Marshall’s
18 brokerage to RESPONDENT’S California Company. *NRED 000056.*

19 10. On August 5, 2021, Poplar Homes confirmed the contract for the Property with “Marshall
20 Stearns/Poplar Homes” was terminated and would transfer all funds back to Complainant within 30 days.
21 *NRED 000057 – 000058.*

22 11. On or about August 16, 2021, the Division issued a Cease and Desist upon
23 RESPONDENT. *NRED 000013 – 000019.*

24 12. On or about October 1, 2021, the Division notified RESPONDENT that it had opened an
25 investigation against RESPONDENT for engaging in activities that require a Nevada real estate license.
26 *NRED 000011.*

27 13. On or about October 7, 2021, the RESPONDENT provided a response admitting to
28 advertising Nevada and/or Las Vegas property management services on his website. *NRED 000060.*

1 **VIOLATIONS OF LAW**

2 RESPONDENT committed the following violations of law:

3 1. RESPONDENT violated NRS 645.230(1)(a) when, he offered to engage in the business
4 of property management, rental and/or lease of, for a fee, in Nevada, without a license.

5 2. RESPONDENT violated NRS 645.230(1)(b) when, pursuant to a property management
6 agreement, for a fee, engaged in property management activities without a license.

7 3. RESPONDENT violated NRS 645.235(1)(a) when, pursuant to a property management
8 agreement, for a fee, engaged in property management activities without a license.

9 **DISCIPLINE AUTHORIZED**

10 4. Pursuant to NRS 645.235(2), the Commission is empowered to impose an administrative
11 fine not to exceed the amount of any gain or economic benefit that the person derived from the violation
12 or \$5,000, whichever is greater.

13 5. Additionally, under NRS 622.400, the Commission is authorized to impose costs of the
14 proceeding upon RESPONDENT, including investigative costs and attorney's fees, if the Commission
15 otherwise imposes discipline on RESPONDENT.

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

18 **NOTICE OF HEARING**

19 **PLEASE TAKE NOTICE**, that a disciplinary hearing has been set to consider the
20 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B and
21 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada Administrative Code.

22 **THE HEARING WILL TAKE PLACE on May 2, 2023, commencing at 9:00 a.m., or as**
23 **soon thereafter as the Commission is able to hear the matter, and each day thereafter commencing**
24 **at 9:00 a.m. through May 4, 2023, or earlier if the business of the Commission is concluded. The**
25 **Commission meeting will be held on May 2, 2023, at the Nevada State Business Center, 3300 West**
26 **Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102. The meeting will continue**
27 **on each day thereafter commencing at 9:00 a.m. through May 4, 2023, at the Nevada State Business**

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1 Center, 3300 West Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102, until the
2 business of the Commission is concluded.

3 **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at the same
4 time as part of a regular meeting of the Commission that is expected to last from May 2, 2023
5 through May 4, 2023, or earlier if the business of the Commission is concluded. Thus, your hearing
6 may be continued until later in the day or from day to day. It is your responsibility to be present
7 when your case is called. If you are not present when your hearing is called, a default may be
8 entered against you and the Commission may decide the case as if all allegations in the complaint
9 were true. If you have any questions, please call Kelly Valadez, Commission Coordinator, at (702)
10 486-4606

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

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

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

26 The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or NAC
27 645 and if the allegations contained herein are substantially proven by the evidence presented and

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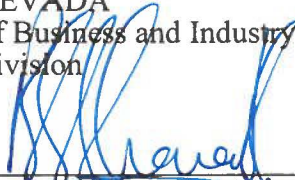
1 to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,
2 pursuant to NRS 645.235, 645.633 and or 645.630.

3
4 DATED this 24 day of March 2023.

DATED this 24th day of March 2023.

5
6 STATE OF NEVADA
7 Department of Business and Industry
8 Real Estate Division

AARON D. FORD
Attorney General

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