

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Case No. 2020-632

Petitioner,

FILED

vs.

JUL 20 2023

JOHN E. GRANT,

REAL ESTATE COMMISSION

Respondent.

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 JOHN E. GRANT, ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL ESTATE COMMISSION ("Commission"). The hearing will be held pursuant to Chapter 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 645.630 and/or NRS 622.400, and the discipline to be imposed, if violations of law are proven.

JURISDICTION

RESPONDENT was licensed as a Nevada real estate broker (B.00398561.0039561.CORP) at all relevant times mentioned in this Complaint, and 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 the times mentioned in this Complaint, John E. Grant ("RESPONDENT") held a valid and active Nevada real estate broker license (B.0039561.CORP). [Bates Stamp 0003]

2. COMPLAINANT Rick LaMay provided the Division on July 17, 2020, with an electronic advertisement from Park Brokerage, Inc. that touted the close of escrow of Green Acres Mobile Home

1 and RV Park located at 501 W. Moana, Reno, NV (“Green Acres” or “Green Acres RV Park”) for
2 \$8,000,000.00 on July 16, 2020. **[Bates Stamp 0008-0009]**

3 3. The Green Acres electronic advertisement specifically stated that “John Sheedy, Senior
4 Vice President with Park Brokerage, Inc., represented the seller and procured [the buyer]” for the Green
5 Acres RV Park property. **[Bates Stamp 0008-0011; 0063-0069]**

6 4. Sheedy’s Nevada salesperson license had expired in April 2018 and had not been renewed
7 by the date escrow closed on Green Acres in July of 2020. **[Bates Stamp 0001-0002]**

8 5. The Division’s investigation revealed another electronic advertisement from Park
9 Brokerage for a second mobile home park, Sierra Skies RV Resort, located at 1400 Old Hot Springs Rd,
10 Carson City, NV 89706 (“Sierra Skies RV Resort”) available for \$4,500,000.00 as of July 17, 2020.
11 **[Bates Stamp 0062-0066]**

12 6. The Park Brokerage, Inc. website (www.parkbrokerage.com) advertised two other Nevada
13 Properties that indicated interested buyers should contact Sheedy for more information: Y Rancho Mobile
14 Home Park, located at 501 El Rancho Rd., Sparks, NV, (“Y Rancho Mobile Home Park”) and Nevada
15 Treasure RV Resort, located at 301 W. Leslie St., Pahrump, NV (“(Nevada Treasure RV Resort”). **[Bates**
16 **Stamp 0025-0026]**

17 7. The Park Brokerage, Inc. website further noted that the Y Rancho Mobile Home Park was
18 listed for \$9,150,000 and sale closed on 10/31/2019 and Nevada Treasure RV Resort listed for \$5,250,000
19 and sale closed on 11/02/2018. **[Bates Stamp 0025-0026]**

20 8. An advertisement for Nevada Treasure RV Resort listed John Sheedy as the sales contact
21 for the property. **[Bates Stamp 0049]**

22 9. An advertisement for Y Rancho Mobile Home Park listed John Sheedy as a sales contact
23 for the property. **[Bates Stamp 0054-0061]**

24 10. In RESPONDENT’S response to the Division’s letter opening investigation against him
25 regarding Green Acres and Sierra Skies RV Resort, he stated to the NRED investigator: “I have been a
26 licensed real estate broker in the State of Nevada for about 20 years. Do I still need to respond to all the
27 request? [sic] You can go to your website and confirm.” **[Bates Stamp 0037-0038]**

1 11. RESPONDENT further responded that he did not have a listing for Green Acres RV Park
2 because the seller marketed the property himself and that RESPONDENT brought an offer that
3 successfully closed. RESPONDENT also stated that he had a listing agreement for Sierra Skies RV Park
4 but could not find a copy to send, and that the property never sold and the listing was ultimately cancelled.

5 **[Bates Stamp 0070-0071]**

6 12. In Sheedy's response to the Division's separate investigation against him, Sheedy claimed
7 that his broker, RESPONDENT, was both broker of record and listing agent for Sierra Skies RV Resort
8 and for Green Acres RV Park, and that RESPONDENT would provide broker files for both properties.

9 **[Bates Stamp 0039]**

10 13. RESPONDENT ultimately produced what he claims were the full files in his possession
11 for Green Acres RV Park, Sierra Skies RV Park, Nevada Treasure RV Resort, and Y Rancho Mobile
12 Home Park. **[Bates Stamp 0070-0227; 0228-0344; 0345-0393; 0394-0457]**

13 14. There was no signed duties owed form or signed listing agreement found in the broker file
14 for Green Acres RV Park. **[Bates Stamp 0070-0227]**

15 15. There was no signed duties owed form found in the broker file for Sierra Skies RV Park.
16 **[Bates Stamp 0228-0344; see, specifically, 0233-0242]**

17 16. There was no signed duties owed form found in the broker file for Nevada Treasure RV
18 Resort. **[Bates Stamp 0345-0393]**

19 17. There was no signed duties owed form found in the broker file for Y Rancho Mobile Home
20 Park. **[Bates Stamp 0394-0457]**

21 18. The Purchase and Sale Agreement with Escrow Instructions for Green Acres RV Park
22 provided that a broker's commission was paid to Park Brokerage Inc. in the sum of \$160,000.00. **[Bates**
23 **Stamp 0084]**

24 19. The Final Settlement Statement dated July 16, 2020 for Green Acres RV Park notes that
25 Park Brokerage Inc. was paid a commission of \$145,000.00. **[Bates Stamp 0100]**

26 20. The Hellosign Audit Trail sheet stated that "Title-Commission-Reno/File Name-Broker
27 Signing Package.pdf, dated 07/14/2020, was sent for signature from jsheedy@parkbrokerage.com to
28 john@parkbrokerage.com, and signed by RESPONDENT on the following day. **[Bates Stamp 0111]**

1 **NOTICE OF HEARING**

2 **PLEASE TAKE NOTICE**, that a disciplinary hearing has been set to consider the
3 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B and
4 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada Administrative Code.

5 **THE HEARING WILL TAKE PLACE on August 22, 2023, commencing at 9:00 a.m., or as**
6 **soon thereafter as the Commission is able to hear the matter, and each day thereafter commencing**
7 **at 9:00 a.m. through August 24, 2023, or earlier if the business of the Commission is concluded.**
8 **The Commission meeting will be held on August 22, 2023, at the Nevada Division of Insurance,**
9 **1818 E. College Parkway, Suite 103, Carson City, Nevada 89706, with video conference to Nevada**
10 **State Business Center, 3300 West Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada**
11 **89102. The meeting will continue on each day thereafter commencing at 9:00 a.m. through August**
12 **24, 2023 until the business of the Commission is concluded.**

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

21 **YOUR RIGHTS AT THE HEARING:** except as mentioned below, the hearing is an open meeting
22 under Nevada’s open meeting law, and may be attended by the public. After the evidence and arguments,
23 the commission may conduct a closed meeting to discuss your alleged misconduct or professional
24 competence. You are entitled to a copy of the transcript of the open and closed portions of the meeting,
25 although you must pay for the transcription.

26 As the Respondent, you are specifically informed that you have the right to appear and be heard
27 in your defense, either personally or through your counsel of choice. At the hearing, the Division has the
28 burden of proving the allegations in the complaint and will call witnesses and present evidence against

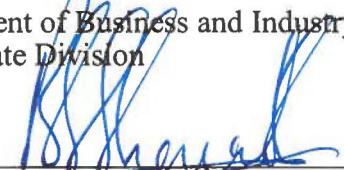
1 you. You have the right to respond and to present relevant evidence and argument on all issues involved.
2 You have the right to call and examine witnesses, introduce exhibits, and cross-examine opposing
3 witnesses on any matter relevant to the issues involved.

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

8 The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or NAC
9 645 and if the allegations contained herein are substantially proven by the evidence presented and
10 to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,
11 pursuant to NRS 645.235, 645.633 and or 645.630.

12 DATED this 19 day of JULY, 2023.

13 State of Nevada
14 Department of Business and Industry
15 Real Estate Division

16 By: 
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19 Las Vegas, Nevada 89102

20 AARON D. FORD
21 Attorney General

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