

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 ALISON LEE,

Respondent.

Case No. 2022-881

FILED

SEP 20 2023

REAL ESTATE COMMISSION

BY Kelley Valadez

10 **COMPLAINT AND NOTICE OF HEARING**

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

19 **JURISDICTION**

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

24 **FACTUAL ALLEGATIONS**

25 1. At all times relevant to this Complaint, Tahoe Lake Love was a California corporation
26 that offered premium vacation rentals of Nevada properties on its website TahoeLakeLove.com.
27 *NRED 000090, NRED 000106, and NRED 000101.*

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1 2. At all times relevant to this Complaint, RESPONDENT was the Chief Executive Officer,
2 Secretary, and Chief Financial Officer for the corporation Tahoe Lake Love. *NRED 000090.*

3 3. At all times relevant to this Complaint, RESPONDENT did not have a Nevada real estate
4 license and/or property manager permit. *NRED 000002–NRED 000003.*

5 4. On or about February 4, 2022, Complainants entered into a Short-Term Rental Agreement
6 with RESPONDENT’S vacation rental company for their property on 682 Ralston Court, Incline Village,
7 Nevada 89451 (the “Property”). *NRED 000112–NRED 000116.*

8 5. RESPONDENT marketed the Property for rent on her website and/or through AirBnB.
9 *NRED 000109.*

10 6. RESPONDENT received compensation in the rental transaction of the Property.
11 *NRED 000126, NRED 000128, and NRED 000130.*

12 7. At all times relevant to this Complaint, RESPONDENT withheld, partially paid and/or
13 did not pay Complainants per the terms of the Short-Term Rental Agreement in balances allegedly
14 amounting to \$22,034.74. *NRED 000131.*

15 8. As a result, on or about November 2, 2022, Complainants reached out to the Division and
16 learned RESPONDENT did not have a license or permit in the State of Nevada. *NRED 000109.*

17 9. Thereafter, on or about November 21, 2022, Complainants filed a complaint against the
18 RESPONDENT. *NRED 000108.*

19 10. From December of 2022 to May of 2023, the Division sent three opening letters, and two
20 demand letters upon the RESPONDENT. *NRED 000008, NRED 000015, NRED 000025, NRED 000047,*
21 *NRED 000037, NRED 000049.*

22 11. On or about December 21, 2022 and January 12, 2023, respectively, the Division issued
23 Cease and Desist Orders upon the RESPONDENT. *NRED 000077–NRED 000078, and NRED 000081–*
24 *NRED 000082.*

25 12. As of June 6, 2023, RESPONDENT continued to advertise a Nevada vacation rental
26 property on her website: “Boho Hideaway” located “in the heart of Incline Village” (Nevada).
27 *NRED 000101.*

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1 **VIOLATIONS OF LAW**

2 RESPONDENT committed the following violations of law:

3 1. RESPONDENT violated NRS 645.230(1)(a) when she 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 **DISCIPLINE AUTHORIZED**

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

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

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

16 **NOTICE OF HEARING**

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

20 **THE HEARING WILL TAKE PLACE on November 7, 2023, commencing at 9:00 a.m., or**
21 **as soon thereafter as the Commission is able to hear the matter, and each day thereafter**
22 **commencing at 9:00 a.m. through November 9, 2023, or earlier if the business of the Commission**
23 **is concluded at the Nevada State Business Center, 3300 West Sahara Avenue, 4th Floor – Nevada**
24 **Room, Las Vegas, Nevada 89102 with video conferencing to Nevada Division of Insurance,**
25 **1818 E. College Parkway, Suite 102, Carson City, Nevada 89706.**

26 **STACKED CALENDAR: Your hearing is one of several hearings scheduled at the same**
27 **time as part of a regular meeting of the Commission that is expected to last from November 7, 2023**
28 **through November 9, 2023, or earlier if the business of the Commission is concluded. Thus, your**

1 **hearing may be continued until later in the day or from day to day. It is your responsibility to be**
2 **present when your case is called. If you are not present when your hearing is called, a default may**
3 **be entered against you and the Commission may decide the case as if all allegations in the complaint**
4 **were true. If you have any questions, please call Kelly Valadez, Commission Coordinator, at**
5 **(702) 486-4606.**

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

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

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

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1 The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or NAC
2 645 and if the allegations contained herein are substantially proven by the evidence presented and
3 to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,
4 pursuant to NRS 645.235, 645.633 and or 645.630.


5 DATED this 19 day of September 2023.

DATED this 19th day of September 2023.

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

AARON D. FORD
Attorney General

9
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