

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 KEA RANA,

10 Respondent.

Case No. 2022-890

**FILED**

JAN 20 2023

REAL ESTATE COMMISSION

BY Kelley Valadez

11 **COMPLAINT AND NOTICE OF HEARING**

12 The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY  
13 OF THE STATE OF NEVADA (“Division”) hereby notifies KEA RANA (“RESPONDENT”), of an  
14 administrative hearing before the STATE OF NEVADA REAL ESTATE COMMISSION  
15 (“Commission”). The hearing will be held pursuant to Chapters 233B and Chapter 645 of the Nevada  
16 Revised Statutes (“NRS”) and Chapter 645 of the Nevada Administrative Code (“NAC”). The purpose  
17 of the hearing is to consider the allegations stated below and to determine if RESPONDENT should be  
18 subject to an administrative penalty as set forth in NRS 645.633 and/or NRS 645.630 and/or NRS  
19 622.400, and the discipline to be imposed, if violations of law are proven.

20 **JURISDICTION**

21 1. At all relevant times, RESPONDENT was licensed by the Division as a broker  
22 (B.0049123.CORP) and held a property management permit (PM.0163622.BKR) issued by the Division  
23 and is therefore subject to the jurisdiction of the Division and the Commission, and the provisions of  
24 NRS chapter 645 and NAC chapter 645.

25 **FACTUAL ALLEGATIONS**

26 2. At all relevant times, RESPONDENT was licensed by the Division as a broker  
27 (B.0049123.CORP) and held a property manager permit (PM.0163622.BKR) from the Division, both of  
28 which are in “active” status. **Exhibit C**, Bates NRED0008-0010.

1           3.       At all times relevant, the RESPONDENT provided property management services through  
2 her company, Vegas Real Estate and Management, located at 10161 Park Run Drive, Suite 150, Las  
3 Vegas, Nevada 89145 (“VREM.”) **Exhibit C**, Bates NRED0009.

4           4.       On or around December 13, 2022, one of RESPONDENT’s former clients, complainant  
5 Marilyn Wright (“Complainant”) filed a complaint with the Division stating that that RESPONDENT, as  
6 property manager for several of Complainant’s properties, provided incorrect payment directions to  
7 tenants and wrongfully retained several of those collected rental payments. **Exhibit D**, Bates NRED0012.

8           5.       On September 26, 2022, the RESPONDENT provided a “duties owed” document to the  
9 Complainant. **Exhibit E**, Bates NRED0030.

10          6.       On September 28, 2022, the RESPONDENT and Complainant entered into a residential  
11 property management agreement for several properties, including those at issue in this Complaint: 10212  
12 Yarmouth Sea Ct., Las Vegas, Nevada 89166 (“Yarmouth Sea Ct.”); 7515 General Whipple Ct., Las  
13 Vegas, Nevada 89166 (“General Whipple Ct.”); 7514 Derby Wharf Ct., Las Vegas, Nevada 89166  
14 (“Derby Wharf Ct.”); and 10220 Ruggles Mansion, Las Vegas, Nevada 89166 (“Ruggles Mansion”).  
15 (collectively, “The Properties”) **Exhibit E**, Bates NRED0004-0018.

16          7.       On September 23, 2022, RESPONDENT sent the tenants of The Properties an email  
17 notifying them that the owners of their properties decided to return to Vegas Real Estate and Management  
18 for property management services and that rents needed to be paid directly to Sahara Wright LLC by  
19 deposit into Complainant’s Chase Bank account ending in Acct. #6990, or electronically via Zelle mobile  
20 payment to “Sahara Wright LLC wright.marilyn@att.net.” **Exhibit E**, Bates NRED0031.

21          8.       The September 23 email further stated that rents from November onwards would be paid  
22 through RESPONDENT’S new software system. **Exhibit E**, Bates NRED0031.

23          9.       On or about October 18, 2022, the tenant for Yarmouth Sea Ct. text messaged  
24 RESPONDENT to ask if “the new link [was] ready to pay November’s rent or is it ok to Zelle again?”  
25 **Exhibit E**, Bates NRED0035.

26          10.       RESPONDENT responded that the new software system was not yet ready and the tenant  
27 could Zelle payment to “Vrampayrent@gmail.com KC rana inc or account #7733821032” **Exhibit E**,  
28 Bates NRED0035-0037.

1 11. Tenant at Yarmouth Sea Ct. subsequently made payment for November rent to  
2 RESPONDENT via a series of Zelle payments for \$1,000.00 (Nov. 1), \$1,000.00 (Nov. 2), and \$300.00  
3 (Nov 4), totaling \$2,300.00. **Exhibit E**, Bates NRED0034.

4 12. The Tenant at General Whipple Ct. also made payment for November 2022 rent via  
5 Venmo directly to RESPONDENT'S Venmo account, based on RESPONDENT'S text message that  
6 payment could be made by Venmo. **Exhibit E**, Bates NRED0040-0042.

7 13. Complainant only learned about the mobile payments for Yarmouth Sea Ct. and General  
8 Whipple Ct. when she separately contacted those tenants to demand their rents on November 23, 2022,  
9 only to find out from them that payments had already been made directly to RESPONDENT'S  
10 [Vrampayrent@gmail.com](mailto:Vrampayrent@gmail.com) mobile payment account, for which the tenants both provided supporting text  
11 messages and payment receipts. **Exhibit E**, Bates NRED0032-0034; 0040-0042.

12 14. As an apparent reaction to those revelations, Complainant sent all of her tenants a  
13 November 23, 2022 email entitled "SAHARA WRIGHT LLC – RENT COLLECTION," noting therein  
14 that RESPONDENT is "solely responsible for the Lease paperwork & any service calls or repairs needed.  
15 She is not authorized to collect rent from anyone." Complainant also reiterated the only authorized ways  
16 to make rental payments: Cash or Check Deposit at your local Chase Bank: Account Name: Sahara  
17 Wright LLC Account # 889026990 OR Zelle: Sahara Wright LLC [wright.marilyn@att.net](mailto:wright.marilyn@att.net)." **Exhibit E**,  
18 Bates NRED0043-0044.

19 15. On December 12, 2022, the tenant at Ruggles Mansion sent an email to Complainant to  
20 confirm his payment of December 2022 rent via Zelle directly to RESPONDENT'S  
21 [Vrampayrent@gmail.com](mailto:Vrampayrent@gmail.com) Zelle account. He further noted that he was unable to see Complainant's  
22 November 23, 2022 "SAHARA WRIGHT LLC – RENT COLLECTION" email because it went to his  
23 spam folder. **Exhibit E**, Bates NRED0045-0046.

24 16. RESPONDENT collected rents on behalf of Complainant for the following properties,  
25 which payments went to RESPONDENT's own mobile payment accounts instead of the accounts  
26 Complainant authorized and/or which were noted in the property management agreement:

- 27 a. \$2,300.00 in rent for 10212 Yarmouth Sea Ct., Las Vegas, Nevada 89166 for  
28 November 2022;



1 **DISCIPLINE AUTHORIZED**

2 1. Pursuant to NRS 645.630 and NRS 645.633, the Commission is empowered to impose an  
3 administrative fine of up to \$10,000 per violation against RESPONDENT and further to suspend, revoke  
4 or place conditions on the license of RESPONDENT.

5 2. Additionally, under NRS Chapter 622, the Commission is authorized to impose costs of the  
6 proceeding upon RESPONDENT, including investigative costs and attorney’s fees, if the Commission  
7 otherwise imposes discipline on RESPONDENT.

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

10 **NOTICE OF HEARING**

11 **PLEASE TAKE NOTICE**, that a disciplinary hearing has been set to consider the  
12 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B and  
13 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada Administrative Code.

14 **THE HEARING WILL TAKE PLACE on February 21, 2023, commencing at 9:00 a.m., or**  
15 **as soon thereafter as the Commission is able to hear the matter, and each day thereafter**  
16 **commencing at 9:00 a.m. through February 23, 2023, or earlier if the business of the Commission**  
17 **is concluded. The Commission meeting will be held on February 21, 2023, at the Nevada State**  
18 **Business Center, 3300 West Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102.**  
19 **The meeting will continue on each day thereafter commencing at 9:00 a.m. through February 23,**  
20 **2023, at the Nevada State Business Center, 3300 West Sahara Avenue, 4th Floor – Nevada Room,**  
21 **Las Vegas, Nevada 89102, until the business of the Commission is concluded.**

22 **STACKED CALENDAR: Your hearing is one of several hearings scheduled at the same**  
23 **time as part of a regular meeting of the Commission that is expected to last from February 21, 2023**  
24 **through February 23, 2023, or earlier if the business of the Commission is concluded. Thus, your**  
25 **hearing may be continued until later in the day or from day to day. It is your responsibility to be**  
26 **present when your case is called. If you are not present when your hearing is called, a default may**  
27 **be entered against you and the Commission may decide the case as if all allegations in the complaint**  
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1 were true. If you have any questions please call Kelly Valadez, Commission Coordinator (702)  
2 486-4606.

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

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

13 You have the right to call and examine witnesses, introduce exhibits, and cross-examine opposing  
14 witnesses on any matter relevant to the issues involved.

15 You have the right to request that the Commission issue subpoenas to compel witnesses to testify  
16 and/or evidence to be offered on your behalf. In making the request, you may be required to demonstrate  
17 the relevance of the witness' testimony and/or evidence. Other important rights you have are listed in  
18 NRS 645.680 through 645.990, NRS Chapter 233B, and NAC 645.810 through 645.920.

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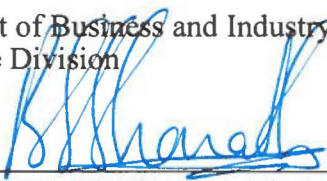
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1 The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or NAC  
2 645 and if the allegations contained herein are substantially proven by the evidence presented and  
3 to further determine what administrative penalty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

5 DATED this 20 day of January, 2023.

6 State of Nevada  
7 Department of Business and Industry  
8 Real Estate Division

9 By:   
10 SHARATH CHANDRA, Administrator  
11 3300 West Sahara Avenue, Suite 350  
12 Las Vegas, Nevada 89102

13 AARON D. FORD  
14 Attorney General

15 By: / s / Phil W. Su  
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