

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 BRADFORD ROBERTS,
10 (B.0143293.LLC – REVOKED,
11 B.1000704.INDV – REVOKED,
12 PM.0164974.BKR - REVOKED)

13 Respondent.

Case No. 2022-592

FILED

JUN 27 2023

REAL ESTATE COMMISSION

BY Kelly Valadez

14 **COMPLAINT AND NOTICE OF HEARING**

15 The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY
16 OF THE STATE OF NEVADA (“Division”) hereby notifies RESPONDENT BRADFORD ROBERTS
17 (“RESPONDENT”) of an administrative hearing before the STATE OF NEVADA REAL ESTATE
18 COMMISSION (“Commission”). The hearing will be held pursuant to Chapters 233B and Chapter 645
19 of the Nevada Revised Statutes (“NRS”) and Chapter 645 of the Nevada Administrative Code (“NAC”).
20 The purpose of the hearing is to consider the allegations stated below and to determine if the
21 RESPONDENT should be subject to an administrative penalty as set forth in NRS 645.235(2) and/or
22 NRS 622.400, and the discipline to be imposed, if violations of law are proven.

23 **JURISDICTION**

24 RESPONDENT, at all relevant times mentioned in this Complaint, held himself out and/or
25 otherwise performed acts as a person required to have licenses and permits while all were revoked
26 (B.0143293.LLC – REVOKED, B.1000704.INDV – REVOKED, PM.0164974.BKR – REVOKED).
27 RESPONDENT is, therefore, subject to the jurisdiction of the Division and the Commission, and the
28 provisions of NRS chapter 645 and NAC chapter 645.

FACTUAL ALLEGATIONS

1. On or about May 14, 2021, the Division filed a complaint against the Respondent
(Case No. 2020-310). *NRED 000083*.

1 2. The Division's Complaint did not allege violations of law regarding unlicensed broker
2 and property manager activities. *NRED 000089 – 000090.*

3 3. On December 29, 2021, the Commission ordered discipline against the Respondent.
4 *NRED 000083, and NRE 000089 – 000091.*

5 4. On January 28, 2022, as so ordered by the Commission, all of the Respondent's real estate
6 licenses and permits were revoked. *NRED 000002.*

7 5. Thereafter, the Division received new complaints that the Respondent was engaging in
8 broker and property manager activities even though all his real estate licenses and permits were revoked.
9 *NRED 000061, and NRED 000092 – 000097.*

10 6. On or about August 11, 2022, as a result of the Respondent's license being revoked, the
11 legal representative for the properties located at 2461 Brooklyn Bridge and 5049 Alfigo immediately
12 terminated its residential property managements with TR Realty. *NRED 000093.*

13 7. The legal representative demanded TR Realty return the funds it was holding for the
14 properties in the total amount of \$7,609.25. *NRED 000093.*

15 8. Of which, "\$2,534.25" was indicated as the "Tenant's August rent and balance" for the
16 property "5049 Alfigo". *NRED 000093.*

17 9. A new property management agreement for the property 5049 Alfigo was signed with
18 another brokerage, Gao Realty LLC. *NRED 000093.*

19 10. On October 5, 2022, the new broker indicated to the Tenant's daughter-in-law that TR
20 Realty had still not refunded the August rent to the owner. *NRED 000093.*

21 11. Another property located at 500 Elm Drive Unit 204 terminated its property management
22 agreement with TR Realty. *NRED 000096.*

23 12. On or about July 23, 2022, the Tenant Benjamin Blackburn was informed not to pay rent
24 to TR Realty anymore because Gao Realty LLC was the new property manager. *NRED 000096.*

25 13. On or about August 6, 2022, the new property manager informed the Tenant that the owner
26 signed a new property management agreement with him. *NRED 000096.*

27 14. The Tenant paid his August rent to Gao Realty LLC. *NRED 000096.*

28 15. The Tenant also paid his September rent to Gao Realty LLC. *NRED 000096.*

1 16. Then on September 8, 2022, the Tenant alleged that the Respondent comes knocking on
2 his door requesting rent to be paid to TR Realty. *NRED 000096.*

3 17. The Tenant alleged that the Respondent said if he “had already paid my rent to anyone
4 else other than TR realty that [he] was being scammed”. *NRED 000096.*

5 18. The Tenant alleged that the Respondent threatened eviction. *NRED 000096.*

6 19. The Respondent led the Tenant to believe that he had made a mistake in paying his rent
7 to Gao Realty LLC. *NRED 000096.*

8 20. Therefore, based on the Respondent’s representations, the Tenant paid the Respondent
9 \$3,000 cash to avoid any more issues. *NRED 000096.*

10 21. On September 19, 2022, Gao Realty LLC informed the Tenant that TR Realty had still
11 not transferred over his \$1,400 security deposit. *NRED 000096.*

12 22. Prompted by the complaints, the Division identified the Respondent’s last known bank
13 account information on his trust account reconciliations. *NRED 000081 – 000082.*

14 23. On or about September 12, 2022, the Division subpoenaed the Respondent’s July 2022
15 bank records and signature cards for his trust accounts. *NRED 000010 – 000013.*

16 24. On or about October 7, 2022, the Division received the bank records requested.
17 *NRED 000022.*

18 25. According to the bank records received, the Respondent was the sole signatory for the
19 property management and security deposit accounts. *NRED 000027 – 000029.*

20 26. The bank records demonstrated significant withdrawals from the property management
21 and security deposit accounts. *NRED 000040, and NRED 000050.*

22 27. The bank records demonstrated significant deposits into the Respondent’s The TR Team
23 LLC dba TR Realty bank account from the property management trust account. *NRED 000032 – 000033,*
24 *and NRED 000040.*

25 28. The bank records indicated the unlicensed Respondent signed checks to pay prepaid rent
26 for a “Tenant already moved out”. *NRED 000048.*

27 29. The bank records indicated the unlicensed Respondent signed checks paying for
28 handyman services. *NRED 000048.*

1 **DISCIPLINE AUTHORIZED**

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

5 2. Additionally, under NRS 622.400, 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; and

8 3. Therefore, the Division requests that the Commission take such disciplinary action as it
9 deems 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 August 22, 2023, commencing at 9:00 a.m., or as**
15 **soon thereafter as the Commission is able to hear the matter, and each day thereafter commencing**
16 **at 9:00 a.m. through August 24, 2023, or earlier if the business of the Commission is concluded.**
17 **The Commission meeting will be held on August 22, 2023, at the Nevada Division of Insurance,**
18 **1818 E. College Parkway, Suite 103, Carson City, Nevada 89706, with video conference to the**
19 **Nevada State Business Center 3300 West Sahara Avenue, 4th Floor, Nevada Room, Las Vegas,**
20 **Nevada 89102. The meeting will continue on each day thereafter commencing at 9:00 a.m. through**
21 **August 24, 2023 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 August 22, 2023**
24 **through August 24, 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**

28 . . .

1 were true. If you have any questions, please call Kelly Valadez, Commission Coordinator,
2 at (702) 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 heard
9 in your defense, either personally or through your counsel of choice. At the hearing, the Division has the
10 burden of proving the allegations in the complaint and will call witnesses and present evidence against
11 you. You have the right to respond and to present relevant evidence and argument on all issues involved.
12 You have the right to call and examine witnesses, introduce exhibits, and cross-examine opposing
13 witnesses on any matter relevant to the issues involved.

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

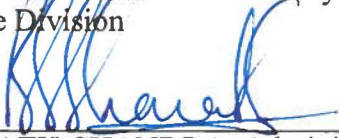
18 The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or NAC
19 645 and if the allegations contained herein are substantially proven by the evidence presented and
20 to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,
21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

22 DATED this 26 day of June 2023.

DATED this 23rd day of June 2023.

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

AARON D. FORD
Attorney General

25 By: 
26 SHARATH CHANDRA, Administrator
27 CHARVEZ FOGER, Deputy Administrator
3300 West Sahara Avenue, Suite 350
28 Las Vegas, Nevada 89102

By: 
CHRISTAL P. KEEGAN, ESQ.
Deputy Attorney General, Bar No. 12725
5420 Kietzke Lane, #202
Reno, Nevada 89511
(775) 687-2141, ckeegan@ag.nv.gov
Attorney for Real Estate Division