

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Case No. 2020-631

FILED

JUL 20 2023

REAL ESTATE COMMISSION

BY Kelley Valadez

Petitioner,

vs.

JOHN SHEEDY, IV,

Respondent.

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 SHEEDY, IV, ("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 acted as a salesperson as defined in NRS 645.040 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 Sheedy IV ("RESPONDENT") did not hold a valid Nevada real estate license. RESPONDENT did previously hold a Nevada salesperson license number S.0181282 that expired on March 31, 2018, and was never subsequently returned to active status. **[Bates Stamp 0001-0002]**

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. The Green Acres electronic advertisement further stated, in the biography section
7 regarding RESPONDENT, that he was licensed in, among other states, Nevada. [Bates Stamp 0019]

8 5. RESPONDENT’S Nevada salesperson license had expired in April 2018 and had not been
9 renewed by the date escrow closed on Green Acres in July of 2020. [Bates Stamp 0001-0002]

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

14 7. The Park Brokerage, Inc. website (www.parkbrokerage.com) advertised two other
15 Nevada Properties that RESPONDENT had listed on the website to contact him for more information: Y
16 Rancho Mobile Home Park, located at 501 El Rancho Rd., Sparks, NV, (“Y Rancho Mobile Home Park”) and
17 Nevada Treasure RV Resort, located at 301 W. Leslie St., Pahrump, NV (“(Nevada Treasure RV
18 Resort”). [Bates Stamp 0025-0026]

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

22 9. An advertisement for Nevada Treasure RV Resort listed John Sheedy as the sales contact
23 for the property. [Bates Stamp 0049]

24 10. An advertisement for Y Ranch Mobile Home Park listed John Sheedy as a sales contact
25 for the property. [Bates Stamp 0054-0061]

26 11. In his response to the Division’s investigation, RESPONDENT claimed that his broker,
27 John Grant, was both broker of record and listing agent for Sierra Skies RV Resort and for Green Acres
28 RV Park, and that Grant would provide broker files for both properties. [Bates Stamp 0039]

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

3 13. There was no signed duties owed form found in the broker file for Sierra Skies RV Park.
4 **[Bates Stamp 0233-0242]**

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

7 15. There was no signed duties owed form found in the broker file for Y Ranch Mobile Home
8 Park. **[Bates Stamp 03943-0457]**

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

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

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

17 19. The seller's estimated settlement statement for Nevada Treasure RV Resort indicated an
18 estimated settlement date of 11/02/2018 and that Park Brokerage, Inc. was to be paid a sum of
19 \$202,000.00 in commission for representing the seller in that sale. **[Bates Stamp 0371-0374]**

20 20. The seller's estimated settlement statement for Y Ranch Mobile Home Park indicated an
21 estimated settlement date of 10/31/2019 and that Park Brokerage, Inc. was to be paid a sum of
22 \$183,000.00 in commission for representing the seller in that sale. **[Bates Stamp 0403]**

23 VIOLATION

24 RESPONDENT has committed the following violations of law:

25 21. RESPONDENT violated NRS 645.230(1)(a) when he acted as a real estate salesperson,
26 as defined by NRS 645.040, without an appropriate license in advertising that he represented the seller
27 and procured the buyer for the property at 501 W. Moana, Reno, NV (Green Acres RV Park).
28

1 through August 24, 2023, or earlier if the business of the Commission is concluded. Thus, your
2 hearing may be continued until later in the day or from day to day. It is your responsibility to be
3 present when your case is called. If you are not present when your hearing is called, a default may
4 be entered against you and the Commission may decide the case as if all allegations in the complaint
5 were true. If you have any questions please call Kelly Valadez, Commission Coordinator (702)
6 486-4606.

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

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


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

22 The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or NAC
23 645 and if the allegations contained herein are substantially proven by the evidence presented and
24 to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,
25 pursuant to NRS 645.235, 645.633 and or 645.630.

26 DATED this 19 day of JULY, 2023.

27 State of Nevada
28 Department of Business and Industry
Real Estate Division

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By: 
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