

1 **BEFORE THE REAL ESTATE COMMISSION**

2 **STATE OF NEVADA**

3 SHARATH CHANDRA, Administrator,  
4 REAL ESTATE DIVISION, DEPARTMENT  
5 OF BUSINESS AND INDUSTRY,  
6 STATE OF NEVADA,

7 Petitioner,

8 vs.

9 KAYVOUGHN MORADI,  
10 (B.0144876.LLC, PM.0166664.BKR)

11 Respondent.

Case No. 2024-350

**FILED**

OCT 01 2024

REAL ESTATE COMMISSION

BY Kerly Valadez

12 **COMPLAINT AND NOTICE OF HEARING**

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

21 **JURISDICTION**

22 RESPONDENT, at all relevant times mentioned in this Complaint, was actively licensed as a  
23 broker (B.0144876.LLC). RESPONDENT is, therefore, subject to the jurisdiction of the Division and  
24 the Commission, and the provisions of NRS Chapter 645 and NAC Chapter 645. As of the date of this  
25 Complaint, RESPONDENT’S broker’s license is currently in “active” status.

26 **FACTUAL ALLEGATIONS**

- 27 1. RESPONDENT’S broker’s license was first issued in April of 2018. *NRED 000003.*  
28 2. On or about April 15, 2022, as a courtesy, the Division informed the RESPONDENT of  
his requirement as a Broker to submit his 546 or 546A Form. *NRED 000004.*





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

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

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


15  
16 DATED this 30 day of September, 2024.

DATED this 27th day of September, 2024.

17 STATE OF NEVADA  
18 Department of Business and Industry  
19 Real Estate Division

AARON D. FORD  
Attorney General

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