1	BEFORE THE REAL ESTATE COMMISSION	
2	STATE OF NEVADA	
3	SHARATH CHANDRA, Administrator, REAL ESTATE DIVISION, DEPARTMENT	Case No. 2024-350
4	OF BUSINESS AND INDUSTRY,	
5	STATE OF NEVADA,	FILED
6	Petitioner,	OCT 0 1 2024
7	VS.	REAL ESTATE COMMISSION
8	KAYVOUGHN MORADI, (B.0144876.LLC, PM.0166664.BKR)	BY Keery Valader
9	Respondent.	
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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 RESPONDENT KAYVOUGHN MORADI	
14	("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL ESTATE	
15	COMMISSION ("Commission"). The hearing will be held pursuant to Chapter 233B and Chapter 645	
16	of the Nevada Revised Statutes ("NRS") and Chapter 645 of the Nevada Administrative Code ("NAC").	
17	The purpose of the hearing is to consider the allegations stated below and to determine if the	
18	RESPONDENT should be subject to an administrative penalty as set forth in NRS 645.630 and/or	
19	NRS 622.400, and the discipline to be imposed, if violations of law are proven.	
20	JURISDICTION	
21	RESPONDENT, at all relevant times mentioned in this Complaint, was actively licensed as a	
22	broker (B.0144876.LLC). RESPONDENT is, therefore, subject to the jurisdiction of the Division and	
23	the Commission, and the provisions of NRS Chapter 645 and NAC Chapter 645. As of the date of this	
24	Complaint, RESPONDENT'S broker's license is currently in "active" status.	
25	5 FACTUAL ALLEGATIONS	
26	1. RESPONDENT'S broker's license	was first issued in April of 2018. NRED 000003.
27	2. On or about April 15, 2022, as a co	ourtesy, the Division informed the RESPONDENT of
28	his requirement as a Broker to submit his 546 or 546A Form. NRED 000004.	

Shortly thereafter, on or about April 18, 2022, the RESPONDENT submitted his tardy 1 3. 2 Form 546A to the Division. NRED 000005. But in 2024, the RESPONDENT failed to submit his Form 546A to the Division. 3 4. 4 NRED 000007 - NRED 000011. Therefore, on or about April 15, 2024, the Division sent a Notice of Violation 5 5. letter to the RESPONDENT'S last known brokerage address on record requesting the required 6 Form 546A and payment of the administrative fine of \$250 due by May 15, 2024. NRED 000006, and 7 8 NRED 000007 - NRED 000011. On or about June 3, 2024, the Division also emailed RESPONDENT informing him his 9 6. 546A Form and fine payment of \$250 were past due. NRED 000013 - NRED 000014. 10 On or about June 11, 2024, the Division informed the RESPONDENT it would proceed 11 7. formally due to his failure to remit the form or the fine. NRED 000012. 12 On or about June 11th and the 20th of 2024, the Division received proof its letter was 13 8. delivered. NRED 000015 - NRED 000016. 14 VIOLATIONS OF LAW 15 16 **RESPONDENT** committed the following violations of law: RESPONDENT violated NRS 645.633(1)(b) pursuant to NAC 645.806(3) for failing to 17 1. submit his Form 546A by the last day of his real estate license expiration month. 18 RESPONDENT violated NRS 645.633(1)(b) pursuant to NAC 645.695 for failing 19 2. to pay the \$250 administrative fine levied by the Division for failure to timely submit the 2024 20 21 Form 546A Affidavit. **DISCIPLINE AUTHORIZED** 2.2. Pursuant to NRS 645.630 and NRS 645.633, the Commission is empowered to impose an 23 3. administrative fine per violation against RESPONDENT that may not exceed \$10,000, and further to 24 suspend, revoke, or place conditions on the license of RESPONDENT. 25Additionally, under NRS 622.400, the Commission is authorized to impose costs of the 264. 27 proceeding upon RESPONDENT, including investigative costs and attorney's fees, if the Commission 28 otherwise imposes discipline on RESPONDENT.

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

NOTICE OF HEARING

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

THE HEARING WILL TAKE PLACE on November 19, 2024, commencing at 9:00 a.m., or as soon thereafter as the Commission is able to hear the matter, and each day thereafter commencing at 9:00 a.m. through November 21, 2024, or earlier if the business of the Commission is concluded. The Commission meeting will be held on November 19, 2024, at the Nevada State Business Center, 3300 W. Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102 with video conferencing to Nevada Division of Insurance, 1818 E. College Parkway, Suite 103, Carson City, Nevada 89706. The meeting will continue on each day thereafter commencing at 9:00 a.m. through November 21, 2024 until the business of the Commission is concluded.

15 STACKED CALENDAR: Your hearing is one of several hearings scheduled at the same 16 time as part of a regular meeting of the Commission that is expected to last from November 19, 17 2024 through November 21, 2024, or earlier if the business of the Commission is concluded. Thus, 18 your hearing may be continued until later in the day or from day to day. It is your responsibility 19 to be present when your case is called. If you are not present when your hearing is called, a default 20may be entered against you and the Commission may decide the case as if all allegations in the 21complaint were true. If you have any questions, please call Kelly Valadez, Commission 22 Coordinator, at (702) 486-4606.

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

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

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

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

15 DATED this 30 day of September, 2024. 16 17 STATE OF NEVADA Department of Business and Industry Real Estate Division 18 19 By: 20SHARATH CHANDRA, Administrator 3300 West Sahara Avenue, Suite 350 21 Las Vegas, Nevada 89102 2.2 23 2425 2627 28

DATED this <u>27th</u> day of September, 2024.

AARON D. FORD Attorney General

By: $\boldsymbol{\mathscr{V}}$ CHRISTAL P. KEEGAN (Bar No. 12725) Deputy Attorney General 5420 Kietzke Lane, Suite 202 Reno, Nevada 89511 (775) 687-2141 ckeegan@ag.nv.gov

Attorney for Real Estate Division

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