

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 MICHELLE A. STEWART,
10 (B.0033239.LLC)

11 Respondent.

Case No. 2024-497

FILED

OCT 01 2024

REAL ESTATE COMMISSION

BY Kelly 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 MICHELLE A.
15 STEWART ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL
16 ESTATE COMMISSION ("Commission"). The hearing will be held pursuant to Chapter 233B and
17 Chapter 645 of the Nevada Revised Statutes ("NRS") and Chapter 645 of the Nevada Administrative
18 Code ("NAC"). The purpose of the hearing is to consider the allegations stated below and to determine
19 if the 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.0033239.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 2020 with an expiration month of
28 April. *NRED 000003.*

1 **DISCIPLINE AUTHORIZED**

2 3. Pursuant to NRS 645.630 and NRS 645.633, the Commission is empowered to impose an
3 administrative fine per violation against RESPONDENT that may not exceed \$10,000, and further to
4 suspend, revoke, or place conditions on the license of RESPONDENT.

5 4. 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.

8 5. 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 Administrative
12 Complaint against the above-named RESPONDENT in accordance with Chapters 233B and 645 of the
13 Nevada Revised Statutes and Chapter 645 of the Nevada Administrative Code.

14 **THE HEARING WILL TAKE PLACE on November 19, 2024, commencing at 9:00 a.m.,**
15 **or as soon thereafter as the Commission is able to hear the matter, and each day thereafter**
16 **commencing at 9:00 a.m. through November 21, 2024, or earlier if the business of the Commission**
17 **is concluded. The Commission meeting will be held on November 19, 2024, at the Nevada State**
18 **Business Center, 3300 W. Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102**
19 **with video conferencing to the Nevada Division of Insurance, 1818 E. College Parkway, Suite 103,**
20 **Carson City, Nevada 89706. The meeting will continue on each day thereafter commencing at 9:00**
21 **a.m. through November 21, 2024, 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 November 19,
24 2024 through November 21, 2024, or earlier if the business of the Commission is concluded. Thus,
25 your hearing may be continued until later in the day or from day to day. It is your responsibility
26 to be present when your case is called. If you are not present when your hearing is called, a default
27 may be entered against you and the Commission may decide the case as if all allegations in the
28 ...

1 **complaint were true. If you have any questions, please call Kelly Valadez, Commission**
2 **Coordinator, 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
5 arguments, the Commission may conduct a closed meeting to discuss your alleged misconduct or
6 professional competence. You are entitled to a copy of the transcript of the open and closed portions of
7 the meeting, 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. You have the right to call and examine witnesses, introduce exhibits, and cross-examine
13 opposing 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
19 NAC 645 and if the allegations contained herein are substantially proven by the evidence presented and

20 ...
21 ...
22 ...

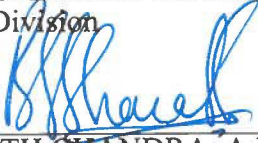
1 to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,
2 pursuant to 645.633 and or 645.630.


3
4 DATED this 30 day of September, 2024.

DATED this 27th day of September, 2024.

5 STATE OF NEVADA
6 Department of Business and Industry
7 Real Estate Division

AARON D. FORD
Attorney General

8 By: 
9 SHARATH CHANDRA, Administrator
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11 Las Vegas, Nevada 89102

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