

1 **BEFORE THE REAL ESTATE COMMISSION**

2 **STATE OF NEVADA**

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

5
6 Petitioner,

7 vs.

8 MICHAEL DALAN ULMER,
(S.0181655)

9 Respondent.

Case No. 2024-505

FILED

OCT 01 2024

REAL ESTATE COMMISSION

BY Kelly Valadez

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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 MICHAEL DALAN
14 ULMER (“RESPONDENT”) of an administrative hearing before the STATE OF NEVADA REAL
15 ESTATE COMMISSION (“Commission”). The hearing will be held pursuant to Chapter 233B and
16 Chapter 645 of the Nevada Revised Statutes (“NRS”) and Chapter 645 of the Nevada Administrative
17 Code (“NAC”). The purpose of the hearing is to consider the allegations stated below and to determine
18 if the 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 salesperson (S.0181655). 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 **FACTUAL ALLEGATIONS**

26 1. At all times relevant, RESPONDENT placed solicitation flyers on doors within a gated
27 community that allegedly restricts such acts. *NRED 000023 – NRED 000025.*

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1 may be entered against you and the Commission may decide the case as if all allegations in the
2 complaint were true. If you have any questions, please call Kelly Valadez, Commission
3 Coordinator, at (702) 486-4606.

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

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

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

19 The purpose of the hearing is to determine if the RESPONDENT has violated NRS 645 and/or
20 NAC 645 and if the allegations contained herein are substantially proven by the evidence presented and

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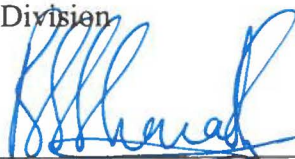
1 to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,
2 pursuant to 645.633 and or 645.630.


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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: 
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