

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 CHARLES F. BOWSHIER,
10 (S.0036055 - REVOKED)

11 Respondent.

Case No. 2023-463

FILED

JUN 30 2025

REAL ESTATE COMMISSION

BY 

12 **OPPOSITION TO RESPONDENT'S REQUEST FOR RECONSIDERATION**
13 **AND EXTENSION TO PAY DISCIPLINARY FINE**

14 The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY
15 OF THE STATE OF NEVADA ("Division"), by and through its attorneys of record, Aaron D. Ford,
16 Attorney General, and Christal P. Keegan, Deputy Attorney General, brings this Opposition to
17 Respondent's Request for Reconsideration and Extension to Pay Disciplinary Fine.

18 DATED this 30th day of June 2025.

19 AARON D. FORD
20 Attorney General

21 By: 
22 CHRISTAL P. KEEGAN, ESQ.
23 Deputy Attorney General
24 Nevada Bar No. 12725
25 5420 Kietzke Lane, Suite 202
26 Reno, Nevada 89511
27 (775) 687-2141
28 ckeegan@ag.nv.gov

Attorney for Real Estate Division

1 **I. BACKGROUND**

2 At the May 14, 2024 Commission Hearing (the “Hearing”), the Commission, ordered Respondent
3 Charles F. Bowshier (“Bowshier”) to pay an administrative fine in the total amount of \$25,579.83 within
4 a generous timeframe of within one (1) year from effective date of the Order, or by no later than July 7,
5 2025.¹ Despite Bowshier being present, and with counsel, neither he, or his counsel, proposed an
6 extended repayment plan at the hearing.² Instead, Bowshier, untimely comes now – over a year later -
7 with his Request for Reconsideration and Extension to Pay Disciplinary Fine filed June 26, 2025.³ The
8 Commission’s Order was lawful, and the Division supports it as entered.⁴

9 **II. LEGAL ARGUMENT**

10 Requests for reconsideration are plainly absent from NRS 645 and NAC 645. Therefore,
11 consulting the Nevada Administrative Procedures Act (NRS 233B), NRS 233B.130(4), provides a
12 petition for reconsideration **must** be filed within 15 days after the date of service of the final decision.
13 (**emphasis added**). The burden of proof is on the party attacking or resisting the decision to show that
14 the final decision is invalid NRS 233B.135.

15 **A. The Request is 368 Days Late and Time-Barred.**

16 The timeframe set forth under NRS 233B.130(4) mandates petitions for rehearing “must be filed
17 within 15 days after the date of service of the final decision.” USPS tracking reports the Commission’s
18 May 29, 2024 Order was delivered on June 7, 2024.⁵ Fifteen (15) days thereafter would have been June
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23 ¹ *Exhibit 1*. Findings of Fact, Conclusions of Law and Order, Case No. 2023-463, filed
May 29, 2024. *Exhibit 2*. Nevada Real Estate Commission Minutes, May 14, 2024, Item 7-C NRED v.
Charles F. Bowshier, Case No. 2023-463.

24 ² *Id.*

25 ³ *Exhibit 3*. Request for Reconsideration and Extension to Pay Disciplinary Fine, filed
June 26, 2025.

26 ⁴ *Exhibit 1*. Findings of Fact, Conclusions of Law and Order, Case No. 2023-463, filed
May 29, 2024.

27 ⁵ *Exhibit 4*. USPS Tracking, Tracking No. 9589071052700884281868 confirms the Order was
28 delivered to an individual at Respondent’s Counsel’s address at 10:44 a.m. on June 7, 2024; Tracking
No. 9589071052700884281875 confirms the Order sent to Respondent’s last known address was
delivered to a neighbor as requested at 2:42 p.m. on June 7, 2024.

22, 2024.⁶ Inexplicably, Bowshier's Request was filed over a year - 368 days - past the required deadline to do so.⁷ Pursuant to NRS 233B.130(4), the Commission should deny the Request as it is time-barred.

B. The Request Fails its Burden of Proof.

While Bowshier has represented he has paid \$3,000 toward the total amount due before the July 7, 2025 deadline,⁸ according to Division's records, this payment was only recently made – on June 25, 2025 - over a year from the date of service of the Order.⁹ Therefore, Bowshier's Request fails to demonstrate any commitment to timely resolving this issue, until the last minute. To date, Bowshier still owes \$22,579.83.¹⁰

As best as the Division can tell, the Request appears to attempt to present a structured repayment plan at \$400/month (maybe more), with the possibility of paying off the balance which is contingent on an alleged inherited real property in a different country without any definitive information regarding the finalizing of that occurrence.¹¹ The Division argues that the request fails his burden of proof and essentially asks the Commission to arbitrarily and capriciously vacate its Order and modify it upon terms without any assurances.

To note, at a monthly payment of \$400 towards the amount still owed \$22,579.83, that is over 56 payments, paid over 4 years and 8.45 months, to which the Division's staff would be tasked with monitoring and record keeping to accommodate the Request.¹²

⁶ Calculating 15 days from June 7, 2024, results on Saturday June 22, 2024.

⁷ Calculating from the NRS 233B.130(4) deadline June 22, 2024 to when the Request for Reconsideration was filed June 25, 2025, results in 1 year, 3 days excluding the end date, or 368 days from the start date to the end date, but not including the end date.

⁸ *Exhibit 3*. Request for Reconsideration and Extension to Pay Disciplinary Fine, June 26, 2025: "To date, I have paid \$3,000 toward the fine prior to the current deadline."

⁹ *Exhibit 5*. Nevada Real Estate Division, Payment Receipt, Transaction Date 06/25/2025, Receipt # 756428, \$3,000 for Admin Fine - Commission Hearing Costs.

¹⁰ *Id.*

¹¹ *Exhibit 3*. Request for Reconsideration and Extension to Pay Disciplinary Fine, June 26, 2025: "I am able to pay \$400.00 or more each month and may be able to pay the balance in full once the sale of an inherited condominium in Mexico is finalized."

¹² Amortization Schedule Year 1: \$4,800 principal, ending balance \$17,779.83; Year 2: \$4,800 principal, ending balance \$12,979.83; Year 3: \$4,800 principal, ending balance \$8,179.83; Year 4: \$4,800 principal, ending balance \$3,379.83; Year 5: principal \$3,379.83, ending balance \$0.00.

1 **C. The Request to Vacate Part of the Order Fails to Allege any Cause or**
2 **Grounds for Reconsideration.**

3 Bowshier's Reconsideration Request does not allege nor demonstrate any causes or grounds
4 which would support reconsideration of the violations of law that the Division proved by a preponderance
5 of the evidence.¹³ Bowshier does not make any claims of: (a) Irregularity in the proceedings in
6 the original hearing; (b) Accident or surprise which ordinary prudence could not have guarded against;
7 (c) Newly discovered evidence of a material nature which the applicant could not with reasonable
8 diligence have discovered and produced at the original hearing; or (d) Error in law occurring at the
9 hearing and objected to by the Respondent during the earlier hearing, that may otherwise entitle him to
10 a reconsideration.¹⁴

11 The Request notes that his insurance has satisfied the victim complainants in this case, but other
12 than just saying so, Bowshier presents no proof that the victim complainants have been made whole or
13 that there is no longer an ongoing dispute related to this matter.¹⁵ As the Commission may recall, this
14 was a serious case, and the Division argues that mere representations of restitution without any proof do
15 not support reconsideration of the violations proven.¹⁶

16 In summary, Bowshier cannot overcome the fact that the Total Amount Due, payable within
17 one (1) year from the effective date of the Order, was fair and generous, reasonable, justified and properly
18 ordered, therefore the Commission should uphold its May 29, 2024 Order.

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24 ¹³ *Exhibit 3. Request for Reconsideration and Extension to Pay Disciplinary Fine, June 26, 2025*

25 ¹⁴ *Id.*

26 ¹⁵ *Exhibit 3. Request for Reconsideration and Extension to Pay Disciplinary Fine, June 26,*
27 2025: "I would also like to note that my Errors & Omissions insurance has already paid Mr. Porfirio
 Rangel and Mrs. Maria Rangel the full amount they requested through mediation, to their satisfaction.
 Therefore, there is no ongoing dispute related to this matter."

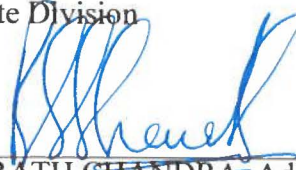
28 ¹⁶ *Exhibit 2. See Nevada Real Estate Commission Minutes, May 14, 2024, Item 7-C NRED v.*
 Charles F. Bowshier, Case No. 2023-463.

1 **III. CONCLUSION**

2 The Respondent acknowledges this is in fact his responsibility, and this Opposition is submitted
3 in support of upholding the Commission's lawful Order.

4
5 DATED this 30 day of June 2025.

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

9 By: 
10 SHARATH CHANDRA, Administrator
11 CHARVEZ FOGER, Deputy Administrator
12 3300 West Sahara Avenue, Suite 350
13 Las Vegas, Nevada 89102

DATED this 30th day of June 2025.

AARON D. FORD
Attorney General

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

Attorney for Real Estate Division

EXHIBIT 1

EXHIBIT 1

STATE OF NEVADA

JOE LOMBARDO
Governor



DR. KRISTOPHER SANCHEZ
Director

SHARATH CHANDRA
Administrator

CHARVEZ FOGER
Deputy Administrator

DEPARTMENT OF BUSINESS AND INDUSTRY
REAL ESTATE DIVISION

AMENDED COVER LETTER

June 5, 2024

Westley U. Villanueva, Esq.
6767 W. Tropicana Avenue # 203
Las Vegas, Nevada 89103

Certified Mail No.: 9589 0710 5270 0884 2818 68

Charles F. Bowshier
United Realty Group
2389 Renaissance Drive, Suite C
Las Vegas, Nevada 89119

Certified Mail No.: 9589 0710 5270 0884 2818 75

RE: NRED v Charles F. Bowshier
Case No: 2023-463

Enclosed you will find the Findings of Fact, Conclusions of Law, and Order entered by the Nevada Real Estate Commission at the meeting held May 14, 2024. This is the fully executed copy for your records.

The Commission has ordered the following:

1. Respondent shall pay an administrative fine to the Division in the total amount of \$25,579.83 ("Amount Due"), which includes a fine of \$20,000.00 for violations of law and \$5,579.83 for the Division's costs and attorney's fees, within one (1) year from the effective date of this Order
2. All Respondent's licenses shall be revoked on the effective date of this Order.

Effective Date: July 5, 2024
Total Amount Due By: July 7, 2025

NOTE: Your fine and/or cost of hearing totals \$10,000.00 or more. Please be aware that pursuant to NRS 353.1467 your payment must now be made electronically. For details on how to submit your electronic payment, please see Informational Bulletin #016 (included) or contact the Department of Business and Industry's Management Analyst Grace Hilgar-Devito at 702-486-5134 or email at ghilgar@business.nv.gov.

Please note that the Division staff does not have the authority to extend the due date for your fine and/or costs which were ordered by the Commission. If you find that you are unable to meet the

required due date, you will need to request in writing that you be placed on the agenda for a Commission hearing in which the Respondent will be allowed to request an extension from the Commission. This request should be made several months prior.

Please contact me if you have questions regarding this matter.

Sincerely,



Kelly Valadez
Commission Coordinator
Telephone: (702) 486-4606
Email: kvaladez@red.nv.gov

Enclosures as indicated

cc: Sharath Chandra, Administrator
Christal P. Keegan, Deputy Attorney General
Licensing Section
Education Section
Compliance Section
Fiscal
Pablo Covarrubias, Jr. - Broker

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,

Case No. 2023-463

5 Petitioner,

FILED

6 vs.

MAY 29 2024

7 CHARLES F. BOWSHIER,
8 (S.0036055)

REAL ESTATE COMMISSION

BY Kelly Valadez

9 Respondent.

10
11 **FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER**

12 This matter came on for hearing before the Real Estate Commission, Department of Business and
13 Industry, State of Nevada (the "Commission"), during a regular agenda set for a three-day stack
14 commencing May 14, 2024 (the "Hearing"). RESPONDENT Charles F. Bowshier ("Respondent")
15 appeared, with his counsel Jocelyne R. Uy (Bar No. 9708) of WUV Law Firm LLC. Christal Park
16 Keegan, Esq., Deputy Attorney General ("DAG Keegan") with the Nevada Attorney General's Office,
17 appeared on behalf of the Real Estate Division of the Department of Business and Industry, State of
18 Nevada (the "Division").

19 DAG Keegan informed the Commission that Respondent had stipulated to the Division's factual
20 allegations and violations of law. DAG Keegan informed the Commission that on the eve of the Hearing,
21 May 13, 2024, Respondent submitted a written statement. Accordingly, DAG Keegan proceeded with
22 presenting testimony from its witness Complainant Maria Juana Rangel. Respondent's Attorney Uy
23 addressed the Commission, and Respondent provided testimony.

24 After hearing testimony presented in this matter and for good cause appearing, the Commission
25 now enters its Findings of Fact, Conclusions of Law, and Order against RESPONDENT as follows:

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9. Until, on or about May 24, 2023, a purchase agreement for the Property was signed electronically at 11:38 PM by the RESPONDENT without the knowledge of his client, the Complainant, for the price of \$242,000. *NRED 000114 - NRED 000129.*

10. On or about June 9, 2023, the Property escrow closed for the sales price \$242,000. Broker *NRED 000125, and NRED 000126.*

11. RESPONDENT, in a letter written, admitted he "made the mistake of signing for [Complainant] accepting an offer of \$242,000 when in fact the price should have been \$332,000."
NRED 000028.

12. RESPONDENT admitted he "accept[s] full responsibility and consequences of this act."
NRED 000028.

13. RESPONDENT stated that he will commit to paying Complainant the amount of \$90,000 on or before December 31, 2023. *NRED 000028*.

14. As of October 30, 2023, RESPONDENT had not made any payments to the Complainant.
NRED 000050 – NRED 000054.

CONCLUSIONS OF LAW

Whereas the Commission found that the Division proved by a preponderance of the evidence the foregoing findings of fact, and unanimously concludes that the RESPONDENT committed the following violations of law, as presented in the Complaint:

1. RESPONDENT violated NRS 645.633(1)(i) pursuant to NAC 645.605(1) for committing deceitful, fraudulent and/or dishonest dealings by failing to do his utmost to protect the public against fraud, misrepresentation and/or unethical real estate practices when he knowingly signed his client's name electronically on the purchase agreement dated May 24, 2023.

2. RESPONDENT violated NRS 645.633(1)(h) pursuant to NAC 645.605(6) for committing grossly negligent and/or incompetent acts when he breached his obligation of absolute fidelity to his client's interest, when, without her knowledge, he electronically signed his client's name on the purchase agreement dated May 24, 2023 at a lowered price of \$242,000.

3. RESPONDENT violated NAC 645.650(2) for failing to provide paperwork timely or not at all to his broker despite repeated requests to do so.

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ORDER

The Commission, being fully apprised in the premises, and good cause appearing to the Commission, and by majority vote, ORDERS as follows:

1. Respondent shall pay an administrative fine to the Division in the total amount of \$25,579.83 ("Amount Due"), which includes a fine of \$20,000 for violations of law and \$5,579.83 for the Division's costs and attorney's fees, within one (1) year from the effective date of this Order.

2. All Respondent's licenses shall be revoked on the effective date of this Order.

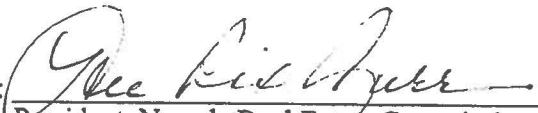
3. If payment is not actually received by the Division on or before its due date, it shall be a default by RESPONDENT. In the event of default, the unpaid balance of the administrative fine and costs, together with any attorney's fees and costs that may have been assessed, shall be due in full to the Division within ten (10) calendar days of the date of default, and the Division may obtain a judgment for the amount owed, including collection fees and costs.

4. The Commission retains jurisdiction for correcting any errors that may have occurred in the drafting and issuance of this document.

5. This Order shall become effective thirty (30) days after the date of this Order.


DATED this 29 day of May, 2024.

NEVADA REAL ESTATE COMMISSION

By: 
President, Nevada Real Estate Commission

DATED this 17th day of May, 2024.

AARON D. FORD
Attorney General

By: 
CHRISTAL P. KEEGAN (Bar No. 12725)
Deputy Attorney General
5420 Kietzke Lane, Suite 202
Reno, Nevada 89511
(775) 687-2141

Attorneys for Real Estate Division

JOE LOMBARDO
Governor

STATE OF NEVADA
REAL ESTATE COMMISSION



Dr. Kristopher Sanchez
Director

LEE GURR
President
DARRELL PLUMMER
Vice-President
DONNA RUTHE
Secretary

DATE: 5/29/2024

RESPONDENT: Charles F. Bowshier

CASE#: 2023-463

HEARING DATE: 5/14/2024

STATEMENT OF HEARING FEES AND COSTS PURSUANT TO NRS 622.400(2)

Administrative Costs: \$ 200.00

Investigative Costs: \$ 400.00

Commission Costs: \$ 150.85

Attorney Fees: \$ 4,828.98

Witness Costs: \$ -

Court Reporter Costs: \$ -

Other Services (Describe service below): \$ -

TOTAL AMOUNT DUE: \$ 5,579.83 *This does not include any fines or restitution ordered by the Commission

EXHIBIT 2

EXHIBIT 2

NEVADA REAL ESTATE COMMISSION MINUTES

IN PERSON AND VIRTUAL VIA WEBEX

May 14, 2024

Nevada State Business Center
3300 W. Sahara Avenue
4th Floor – Nevada Room
Las Vegas, Nevada 89102

VIDEO CONFERENCE TO:
Nevada Division of Insurance
1818 East College Parkway
Suite 103
Carson City, Nevada 89706

The meeting was called to order at 9:06 AM

1-A) Introduction of Commissioners in Attendance

Lee Gurr, Elko County; Darrell Plummer, Washoe County; Donna A. Ruthe, Clark County; David Tina, Clark County; and Forrest Barbee, Clark County.

Commission Counsel: Deputy Attorney General Ziwei Zheng

1-B) Swearing in of Newly Appointed Commissioner

Commissioner Forrest Barbee was sworn in.

1-C) Introduction of Division Staff in Attendance

Sharath Chandra, Administrator; Charvez Foger, Deputy Administrator; Shareece Bates, Administration Section Manager; Kelly Valadez, Commission Coordinator; Maria Gallo, Commission Coordinator; Jan Holle, Chief Compliance Audit Investigator; Shannon Goddard, Compliance Audit Investigator; Annalyn Carrillo, Education and Information Officer; Shaun McLean, Compliance Audit Investigator; Senior Deputy Attorney General Phil Su and Deputy Attorney General Christal P. Keegan representing the Division.

2) Public Comment

No public comment.

7-C) NRED v Charles F. Bowshier, for possible action **Case No. 2023-463**

Parties Present

Charles Bowshier was present.

Jocelyne Uy, Esq. was present representing Charles Bowshier.

Christal P. Keegan, Deputy Attorney General, was present representing the Division.

Maria Rangel, complainant, was present.
Miriam Jimenez, Spanish Translator, was present.

Preliminary Matters

Ms. Keegan stated that through last-minute efforts, Mr. Bowshier does not contest the factual allegations and violations of law in the Division's complaint filed January 9, 2024, and its first amended complaint filed March 13, 2024. Ms. Keegan stated that Mr. Bowshier has provided a written statement to the Commission that was filed May 13, 2024, and the complainant, Ms. Rangel, would like to address the Commission. Ms. Keegan stated that Mr. Bowshier's attorney would also like to address the Commission in consideration of the disciplinary action pursuant to NRS 645.630 and NRS 645.633 and that the State does not have a problem with that but does not agree that the pending civil lawsuit has prevented Mr. Bowshier from making the complainant whole nor is it relevant. Ms. Keegan stated that the State had to incur the costs of preparing this case for a full hearing because the stipulation to the facts and violations came on the eve of this hearing and she is asking the Commission to honor those costs and adopt the disciplinary recommendations by the Division.

Maria Rangel gave a statement in Spanish interpreted by Ms. Jiminez, the Spanish translator. Maria Rangel stated that she trusted Mr. Bowshier, as a Spanish speaking realtor, to help her with the documents to sell her home. Ms. Rangel stated that when she went to Netco Title Company to sign the documents, Mr. Bowshier was not present. Ms. Rangel stated that she had expected Mr. Bowshier to be present to assist with the signing of the documents and she was confused because the documents were written in English, and Mr. Bowshier had informed Netco Title ahead of time that she did not speak English. Ms. Rangel stated that she was presented with the settlement statement, and if Mr. Bowshier had been present at the signing of the documents, he could have stopped the transaction right then. Ms. Rangle stated that Mr. Bowshier gave her a handwritten confession and stated that he would pay her \$90,000.00, but to date, that has not happened. Ms. Rangel stated that she was upset that Mr. Bowshier forged her name to sell her home for nearly a \$100,000.00 loss. Ms. Rangel stated that she would like restitution for the fraud that Mr. Bowshier committed against her and that was the reason she filed the complaint with the Division and the lawsuit against Mr. Bowshier. Ms. Rangel stated that in front of herself and her husband, Mr. Bowshier committed to paying them \$70,000.00 from his mom's inheritance. Ms. Rangel stated that when Mr. Bowshier says his insurance carrier will not pay anything until the court case is resolved, that has nothing to do with the estate money that he promised. Ms. Rangel stated that she feels betrayed, and Mr. Bowshier did not do the right thing.

President Gurr asked if the allegation in the complaint was, instead of Mr. Bowshier selling Ms. Rangel's house for \$332,000.00, the purchase contract was for \$242,000.00, which was a difference of \$90,000.00.

Ms. Rangel answered yes.

President Gurr asked if it was \$70,000.00 that was coming from Mr. Bowshier's mother's estate.

Ms. Rangel stated that Mr. Bowshier said he would pay her \$90,000.00.

Ms. Keegan stated that Mr. Bowshier's handwritten confession stated that he would pay Ms. Rangel \$70,000.00 from his mother's inheritance and \$20,000.00 gradually through his real estate commissions for a total of \$90,000.00.

Ms. Rangel stated that is correct.

Ms. Uy stated that Mr. Bowshier understands that he made a mistake, and his intent is to reimburse the client the amount of the error, however when he created that document, he did it as a security in the event that he did not pay, the client could present that, but before he could get to the point of payment, the civil action was filed in District Court. Ms. Uy stated that she has been working with the Deputy Attorney General to find the best remedy for this matter knowing that there is a civil litigation in progress, as well as this proceeding, but the insurance company now controls the repayment, so guidance is being requested to reach a resolution, as to not disturb one process or the other.

Ms. Keegan stated that the pending civil lawsuit has no effect on the ability of the Commission to decide the appropriate disciplinary action in this matter. Ms. Keegan stated that Mr. Bowshier has not made the complainant whole and she will defer to the Division and its recommendations.

Ms. Uy stated that Mr. Bowshier's intent is to make the complainant whole. Ms. Uy stated that an offer was presented by the State for Mr. Bowshier to either surrender his license or pay the amount and the question in response was, if Mr. Bowshier pays the amount in this administrative hearing, how does that effect the civil action, and no one could give guidance. Ms. Uy stated that Mr. Bowshier wants to keep his license, but she could not advise him to pay the amount when there is civil action is pending.

Ms. Keegan stated that the State disagrees that the civil litigation is preventing Mr. Bowshier from paying because in civil litigation there are settlement waivers and resolution of claims had he made Ms. Rangel whole.

President Gurr stated that she is inclined to grant a continuance in this matter to give the complainant the opportunity to settle the adjudication and have the respondent appear back before the Commission after he has had an opportunity to make the complainant at least partially whole.

Commissioner Ruthe stated that the complaint with the Division and the civil action are two separate entities, and the Commission is here to protect the public. Commissioner Ruthe stated that she disagrees with a continuance.

President Gurr stated that to elaborate on her previous comment, there is no way to anticipate what will happen in the future unless there is a confirmed path of non-compliance in evidence, which there is not. President Gurr stated that if the Commission is considering disciplinary action based on no restitution being made, her reaction is different, than if Mr. Bowshier appeared before the Commission with proof that he had paid the \$70,000.00 from his mother's estate that he agreed to pay.

Commissioner Plummer stated that this is not the first time that a case has been before the Commission where there is a civil action in unison and there has never been any conversation of the Commission delaying their process. Commissioner Plummer asked without a stipulation for settlement in front of the Commission, would this matter move forward as a full hearing by the Commission.

Ms. Keegan stated that this matter would go into a full hearing, but in the preliminary matters respondent stipulated to the facts and violations of law in the Division's complaint and first amended complaint, so the Commissioners can accept that as true and move forward with the disciplinary action.

Commissioner Plummer stated that he would like to proceed with the Division's recommendations for discipline.

Commissioner Tina stated that he agrees with Commissioner Plummer because this house closed on June 9, 2023, and none of the \$90,000.00 has been paid back, and that Mr. Bowshier signed for Mr. and Mrs. Rangel.

Commissioner Barbee stated that the statement of apology was too little, too late, and the delays are mounting.

Ms. Keegan read the factual allegations and violations of law from the complaint filed on January 9, 2024, and the additional violation of law #4 from the first amended complaint filed on March 13, 2024, into the record.

Mr. Bowshier stated his case.

Ms. Keegan questioned Mr. Bowshier.

The Commission questioned Mr. Bowshier.

Factual Allegations

Commissioner Ruthe moved that the factual allegations have been proven. Seconded by Commissioner Plummer. Motion carried.

Violations of Law

Commissioner Plummer moved that the violations of law have been proven. Seconded by Commissioner Tina. Motion carried.

Division's Recommendation for Discipline

Jan Holle presented this:

- \$20,000.00 fine, plus the costs of the hearing and investigation in the amount of \$5,579.83 within one year of the effective date of the order.
- Revocation of all licenses and permits.

Commissioner Plummer moved in the matter of NRED v Charles F. Bowshier case# 2023-463 that the Commission impose a fine of \$20,000.00 plus the costs of the hearing and investigation in the amount of \$5,579.83 to be payable within one year of the effective date of the order, and revocation of all licenses and permits. Seconded by Commissioner Tina.

President Gurr stated that having reread the complaint, response, and letter of apology, Mr. Bowshier's actions with this specific incident is not a continuing pattern of practice and he was distraught over the death of his mother, so she is not in support of revoking his licenses and permits.

Commissioner Plummer stated that when you sign something electronically or with a pen in your hand, that is forgery, so anyone who does that once, or more than once, their license should be revoked.

Commissioner Ruthe stated that this is the one time that the respondent was caught, and they do not know if it has happened before, and that everyone will have tragedies in their lifetime, but forgery is a big wrongdoing.

Motion carried 4:1 with President Gurr opposed.

7-E) NRED v Ivan Alarcon, for possible action
Case No. 2023-954

Parties Present

Ivan Alarcon was present.

Janeen Isaacson, Esq. was present representing Ivan Alarcon.

Christal P. Keegan, Deputy Attorney General, was present representing the Division.

Preliminary Matters

Ms. Keegan stated that there are two motions, the respondent's Motion for Partial Summary Judgement and the State's Motion in Limine, for consideration by the Commission prior to hearing this case. Ms. Keegan stated that the respondent's Motion for Partial Summary Judgement was filed on May 1, 2024, and the Division filed its Opposition to the motion on May 2, 2024. Ms. Keegan stated that on May 10, 2024, a reply by the respondent was filed, and pursuant to NAC 645.840, it does not prescribe the option to file a reply, and pursuant to NAC 645.840(4), the State is requesting an opportunity for brief oral argument based on that submission.


President Gurr stated that the Commission would begin hearing the Motion for Partial Summary Judgement.

Ms. Isaacson stated a complaint was filed before this Commission that alleges five factual allegations, but even if all five factual allegations were true, the violations cannot be proven. Ms. Isaacson stated that the allegations in the complaint are asking this Commission to classify Mr. Alarcon's felony as a crime of moral turpitude, as well as a crime related to the practice of real estate, neither of which have been proven by this complaint. Ms. Isaacson stated that on February 14, 2022, Mr. Alarcon, while driving with his girlfriend as a passenger, was in an accident. Ms.

EXHIBIT 3

EXHIBIT 3

June 25, 2025
Charles F. Bowshier
5258 Meikle Ln
Las Vegas, NV 89156
carlos@areavegas.com
702-542-7545

FILED
JUN 26 2025
REAL ESTATE COMMISSION
BY 

TO:
Nevada Real Estate Division
3300 W. Sahara Ave, Suite 350
Las Vegas, NV 89102

Case Number: 2023-463

Subject: Request for Reconsideration and Extension to Pay Disciplinary Fine

Dear Nevada Real Estate Division,

I am writing to respectfully request an extension of time to complete the payment of the disciplinary fine totaling \$25,579.83. I fully acknowledge my responsibility in this matter and intend to satisfy the remaining balance in good faith.

To date, I have paid \$3,000 toward the fine prior to the current deadline. I kindly request an extension and propose a one-year payment plan to fulfill the remaining balance in a timely and consistent manner.

I would also like to note that my Errors & Omissions insurance has already paid Mr. Porfirio Rangel and Mrs. Maria Rangel the full amount they requested through mediation, to their satisfaction. Therefore, there is no ongoing dispute related to this matter.

While my financial situation is still stabilizing, I am committed to resolving this issue responsibly. I am able to pay \$400.00 or more each month and may be able to pay the balance in full once the sale of an inherited condominium in Mexico is finalized.

Please advise me on the proper steps to formalize this request and let me know if you require any additional documentation.

Thank you very much for your time and consideration.

Sincerely,
Charles F. Bowshier

EXHIBIT 4

EXHIBIT 4

Tracking Number:

Remove X

9589071052700884281868

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item was delivered to an individual at the address at 10:44 am on June 7, 2024 in LAS VEGAS, NV 89103.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Left with Individual

LAS VEGAS, NV 89103

June 7, 2024, 10:44 am

Departed USPS Regional Facility

LAS VEGAS NV DISTRIBUTION CENTER

June 7, 2024, 8:56 am

Arrived at USPS Regional Facility

LAS VEGAS NV DISTRIBUTION CENTER

June 6, 2024, 11:38 pm

Hide Tracking History

[What Do USPS Tracking Statuses Mean?](https://faq.usps.com/s/article/Where-is-my-package) (<https://faq.usps.com/s/article/Where-is-my-package>)

Text & Email Updates	▼
USPS Tracking Plus®	▼
Product Information	▼

See Less ^

Tracking Number:

Remove X

9589071052700884281875

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item was delivered to a neighbor as requested at 2:42 pm on June 7, 2024 in LAS VEGAS, NV 89119.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Neighbor as Requested

LAS VEGAS, NV 89119
June 7, 2024, 2:42 pm

Departed USPS Regional Facility

LAS VEGAS NV DISTRIBUTION CENTER
June 7, 2024, 8:56 am

Arrived at USPS Regional Facility

LAS VEGAS NV DISTRIBUTION CENTER
June 6, 2024, 10:36 pm

Hide Tracking History

[What Do USPS Tracking Statuses Mean?](https://faq.usps.com/s/article/Where-is-my-package) (https://faq.usps.com/s/article/Where-is-my-package)

See More ▾

Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

FAQs

EXHIBIT 5

EXHIBIT 5

<https://elicense-pst.micropact.com/nvdbi/production/intranet/credFeeReceiptView.asp?THIdnt=>
**Nevada Department of Business and Industry
Real Estate Division**
Payment Receipt

Transaction Date : 06/25/2025

Cashier : Giesell Hernandez

Receipt # : 756482

Receipt Identification : CHARLES F BOWSHIER

Money Tendered

Type	Amount	Reference	Payer Name	Payment Comment
Credit Card	\$3,045.00	025846	CHARLES F BOWSHIER	ADMIN FINE
Total :	\$3,045.00			

Distribution

License	Use	Amount	Fee Desc	Business Name	Paid From	Paid To	BY
S.0036055	----	45.00	Service Fee - 1.5% for Credit Card Payments	CHARLES BOWSHIER	07/01/2023	06/30/2025	Giesell Hernandez
S.0036055	----	3,000.00	RE COMMISSION HEARING COSTS ONLY	CHARLES BOWSHIER	07/01/2023	06/30/2025	Giesell Hernandez

The following licenses have fees due or credit amounts available.

S.0036055 \$22,579.83 Fees Due

Print

Close