

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 ELOUISA FARRALES,
10 (B.1000379.INDV),

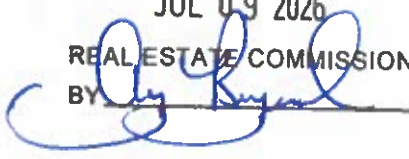
11 Respondent.

Case No. 2025-410

FILED

JUL 09 2026

REAL ESTATE COMMISSION

BY 

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 ELOUISA FARRALES
15 ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL ESTATE
16 COMMISSION ("Commission"). The hearing will be held pursuant to Chapters 233B and 645 of the
17 Nevada Revised Statutes ("NRS") and Chapter 645 of the Nevada Administrative Code ("NAC"). The
18 purpose of the hearing is to consider the allegations stated below; ascertain which violations of law are
19 proven, if any; and determine whether RESPONDENT should be subject to disciplinary actions and fees
20 set forth in NRS 645.630, NRS 645.647, and/or NRS 622.400, including but not limited to license
21 revocation, administrative fines, and attorney fees.

22 **JURISDICTION**

23 RESPONDENT, at all relevant times mentioned in this Complaint, was actively licensed as a
24 broker (B.1000379.INDV). RESPONDENT is, therefore, subject to the jurisdiction of the Division and
25 the Commission, and the provisions of NRS Chapter 645 and NAC Chapter 645. RESPONDENT's
26 broker's license (B.1000379.INDV) was issued on January 12, 2009; expires on January 31, 2028; and
27 is active as of the date of this Complaint.

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1 **FACTUAL ALLEGATIONS**

2 1. On January 12, 2009, the Division issued RESPONDENT a broker's license
3 (B.1000379.INDV), subjecting RESPONDENT to the ongoing licensure requirements set forth in NRS
4 Chapter 645. [NRED0004].

5 2. On or about June 5, 2025, the Division notified RESPONDENT of (1) RESPONDENT's
6 failure to timely submit a Form 546A as is required by NAC 645.806(3); (2) the Division's consequential
7 imposition of an administrative fine (\$250.00) pursuant to NAC 645.695; and (3) the deadline of July 6,
8 2025, for RESPONDENT to provide the Division with both the Form 546A and fine payment.
9 [NRED0006 – NRED0008].

10 3. On or about June 18, 2025, RESPONDENT mailed the DIVISION a letter, appealing the
11 Division's violation notice regarding the Form 546A. [NRED0002]. The letter enclosed
12 RESPONDENT's completed Form 546A, did not include payment for the administrative fine, and
13 requested the Division waive the imposed fine amount. *Id.*

14 4. On or about June 30, 2025, the Division denied RESPONDENT's appeal, finding (1)
15 Respondent's Form 546A submittal was untimely, (2) RESPONDENT had a history of late submittals,
16 and (3) the Division had previously warned RESPONDENT that future late submittals would incur an
17 administrative fine of \$250.00. [NRED0009].

18 5. On or about August 19, 2025, the Division sent RESPONDENT a demand letter for the
19 unpaid administrative fine. [NRED0010].

20 6. On or about March 12, 2026, the Division informed RESPONDENT it would proceed
21 against her by filing a formal complaint with the Commission for hearing on her non-payment of the
22 administrative fine. [NRED0011].

23 7. As of the date of this Complaint, the Division has received neither payment nor further
24 communications from RESPONDENT regarding the unpaid administrative fine.

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1 **VIOLATIONS OF LAW**

2 RESPONDENT committed the following violations of law:

3 1. RESPONDENT violated NAC 645.806 by failing to timely provide the Division with a
4 declaration informing the Division that she is not required to provide a reconciliation of trusts, on a form
5 prescribed by the Division (i.e., Form 546A) and failing to pay the \$250 administrative fine imposed by
6 the Division.

7 **DISCIPLINE AUTHORIZED**

8 1. Pursuant to NRS 645.647(2), the Commission may, in addition to any other remedy or
9 penalty, as appropriate, refuse to renew, or suspend or revoke, the license of a person who has failed to
10 pay money which the person owes to the Commission or the Division. Accordingly, the Commission
11 may refuse to renew, suspend, or revoke RESPONDENT's broker's license pursuant to NRS 645.647(2).

12 2. Additionally, under NRS 622.400, the Commission is authorized to impose costs of the
13 proceeding upon RESPONDENT, including investigative costs and attorney's fees, if the Commission
14 otherwise imposes discipline on RESPONDENT.

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

17 **NOTICE OF HEARING**

18 **PLEASE TAKE NOTICE, that a disciplinary hearing has been set to consider the**
19 **Administrative Complaint against the above-named Respondent in accordance with Chapters**
20 **233B and 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada Administrative Code.**

21 **THE HEARING WILL TAKE PLACE on August 11, 2026, commencing at 9:00 a.m., or as**
22 **soon thereafter as the Commission is able to hear the matter, and each day thereafter commencing**
23 **at 9:00 a.m. through August 13, 2026, or earlier if the business of the Commission is concluded. The**
24 **Commission meeting will be held on August 11, 2026, through August 13, 2026, at the Nevada**
25 **Division of Insurance, 1818 College Parkway, Suite 103, Carson City, Nevada 89706 with video**
26 **conferencing to the Nevada State Business Center, 3300 W. Sahara Avenue, 4th Floor – Nevada**
27 **Room, Las Vegas, Nevada 89102.**

1 **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at the same
2 time as part of a regular meeting of the Commission that is expected to last from August 11, 2026,
3 through August 13, 2026, or earlier if the business of the Commission is concluded. Thus, your
4 hearing may be continued until later in the day or from day to day. It is your responsibility to be
5 present when your case is called. If you are not present when your hearing is called, a default may
6 be entered against you and the Commission may decide the case as if all allegations in the complaint
7 were true. If you have any questions, please call Amy Reveyrand, Commission Coordinator, at
8 (702) 486-4606.

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

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

20 You have the right to request that the Commission issue subpoenas to compel witnesses to
21 testify and/or evidence to be offered on your behalf. In making the request, you may be required
22 to demonstrate the relevance of the witness' testimony and/or evidence. Other important rights
23 you have are listed in NRS 645.680 through 645.990, NRS Chapter 233B, and NAC 645.810 through
24 645.875.

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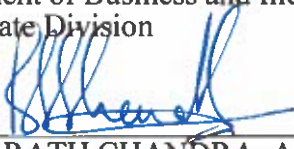
1 **The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or**
2 **NAC 645 and if the allegations contained herein are substantially proven by the evidence**
3 **presented and to further determine what administrative penalty is to be assessed against the**
4 **RESPONDENT, if any, pursuant to NRS 645.235, 645.633 and or 645.630.**

5 DATED this 9 day of July, 2026.

DATED this 9th day of July, 2026.

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

AARON D. FORD
Attorney General

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9 By: 
SHARATH CHANDRA, Administrator
Nevada Division of Real Estate
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By: /s/ Ashley M. Kim
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