

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

SHARATH CHANDRA, Administrator,
REAL ESTATE DIVISION, DEPARTMENT
OF BUSINESS & INDUSTRY,
STATE OF NEVADA,

Petitioner,

vs.

VERA M. MCCAULEY,
(B.0014342.INDV),

Respondent.

Case No. 2025-413

FILED

JUL 09 2026

REAL ESTATE COMMISSION

BY 

COMPLAINT AND NOTICE OF HEARING

The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY OF THE STATE OF NEVADA ("Division") hereby notifies RESPONDENT VERA M. MCCAULEY ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL ESTATE COMMISSION ("Commission"). The hearing will be held pursuant to Chapter 233B and Chapter 645 of the Nevada Revised Statutes ("NRS"), and Chapter 645 of the Nevada Administrative Code ("NAC"). The purpose of the hearing is to consider the allegations stated below and to determine if the RESPONDENT should be subject to an administrative penalty as set forth in NAC 645.806 (3), and the discipline to be imposed, if violations of law are proven.

JURISDICTION

RESPONDENT was at all relevant times mentioned in the Complaint licensed as a Broker under license number B.0014342.INDV and is therefore subject to the jurisdiction of the Division and the Commission, and the provisions of NRS chapter 645 and NAC chapter 645.

FACTUAL ALLEGATIONS

1. At all times relevant to this Complaint, RESPONDENT has been broker of record for LOS PRADOS REALTY. [NRED0001-0002]
2. RESPONDENT's broker license was first issued on January 6, 1984, which set her renewal due for January 31 of each calendar year. [NRED0002]

3. On June 5, 2025, the Division issued a Notice of Violation letter to RESPONDENT to her business address as registered with the Division, alerting her that she had failed to timely provide her Form 546/546A trust account reconciliation documentation, due on January 31, 2025. [NRED0003-0004]

4. In the June 5, 2025, letter the Division also imposed a fine of \$250 pursuant to NAC 645.695 for failure to submit the form timely. [NRED0003-0004]

5. The Division requested that RESPONDENT submit the Trust Reconciliation Form and pay the fine by July 6, 2025. The letter also informed RESPONDENT of her rights if she disagreed with the finding of violation and/or imposition of the fine. [NRED0003-0004]

6. RESPONDENT failed to respond to the letter, remit the fine, or submit her completed 546/546A Trust Reconciliation Form by the due date of July 6, 2025.

7. On August 19, 2025, the Division sent a Demand Letter noting that RESPONDENT had failed to respond to the Notice of Violation and extending the deadline to pay the fine and submit the 2025 forms to September 1, 2025. [NRED0008]

8. RESPONDENT also failed to respond to the Demand Letter, remit the fine, or submit the completed 546/546A Trust Reconciliation Form by the September 1, 2025, due date.

9. On March 12, 2026, the Division issued RESPONDENT an NRS 233B letter via certified mail, informing RESPONDENT of the Division's intent to refer the matter for hearing before the Real Estate Commission due to non-payment of the administrative fine imposed as a result of her violation of NAC 645.806(3), and due to her ongoing failure to file her Form 546/546A for the 2025 renewal period.[NRED000X]At all times relevant to this Complaint, RESPONDENT has been broker of record of Peak Realty & Investment, LLC. . [NRED0009-0010]

VIOLATIONS OF LAW

RESPONDENT has committed the following violations of law:

1. RESPONDENT violated NRS 645.633(1)(b) pursuant to NAC 645.806(2) by failing to timely submit her annual Trust Account Reconciliation Form to the Division for 2025, which was due by the last day of the expiration month for her broker license.

2. RESPONDENT violated NRS 645.633(1)(b) pursuant to NAC 645.695 by failing to pay the \$250.00 administrative fine levied by the Division for failure to timely submit the 2025 Form 546/546A affidavit.

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1 **DISCIPLINE AUTHORIZED**

2 Pursuant to NRS 645.630(g)(2), the Commission is empowered to impose an administrative fine
3 of up to \$10,000 per violation and suspend, revoke, or place conditions on RESPONDENT'S license if
4 warranted.

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

10 **NOTICE OF HEARING**

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

14 **THE HEARING WILL TAKE PLACE on August 11, 2026, commencing at 9:00 a.m., or as**
15 **soon thereafter as the Commission is able to hear the matter, and each day thereafter commencing**
16 **at 9:00 a.m. through August 13, 2026, or earlier if the business of the Commission is concluded. The**
17 **Commission meeting will be held at the Nevada Division of Insurance, 1818 College Parkway, Suite**
18 **103, Carson City, Nevada 89706 with video conferencing to the Nevada State Business Center, 3300**
19 **W. Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102.**

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

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

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

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

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

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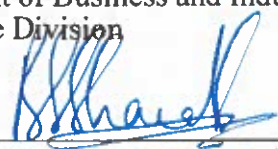
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1 further determine what administrative penalty is to be assessed against the RESPONDENT, if any,
2 pursuant to NRS 645.630.

3 DATED the 8th day of July, 2026.

4 State of Nevada
5 Department of Business and Industry
6 Real Estate Division

7 By: 
8 SHARATH CHANDRA, Administrator
9 3300 West Sahara Avenue, Suite 350
10 Las Vegas, Nevada 89102

11 AARON D. FORD
12 Attorney General

13 By: /s/ Phil W. Su
14 PHIL W. SU (Bar No. 10450)
15 Senior Deputy Attorney General
16 MALACHI HERMAN (Level 2 Certification
17 of Limited Practice Pursuant to SCR 49.3)
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