

1 BEFORE THE REAL ESTATE COMMISSION

2 STATE OF NEVADA

3 SHARATH CHANDRA, Administrator,
4 REAL ESTATE DIVISION,
5 DEPARTMENT
6 OF BUSINESS & INDUSTRY,
7 STATE OF NEVADA,

Case No. 2025-473

Petitioner,

8 vs.

9 EDWARD HOLMES,
10 (B.1002896.LLC-Inactive),
11 (S.0175875 - Closed)
12 (PM.0167123.BKR - Expired),

Respondent.

FILED

APR 03 2026

REAL ESTATE COMMISSION

BY 

13 **COMPLAINT AND NOTICE OF HEARING**

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

23 **JURISDICTION**

24 RESPONDENT, at all relevant times mentioned in this Complaint, was actively
25 licensed as a Broker (B.1002896.LLC) and held a property management permit
26 (PM.0167123.BKR). RESPONDENT is, therefore, subject to the jurisdiction of the Division
27 and the Commission, and the provisions of NRS Chapter 645 and NAC Chapter 645.

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2 **FACTUAL ALLEGATIONS**

3 1. At all times relevant to this Complaint, RESPONDENT was registered as the
4 broker of record with View Point Realty. [NRED0073-0074]

5 2. On June 2, 2025, the Division received a Statement of Fact from Tricia Leigh
6 (“COMPLAINT” and, as to Ms. Leigh “COMPLAINANT”), alleging that, among other
7 matters, Mr. Tai Pham (“Mr. Pham”) and Ms. Cristina Balderrama (hereafter,
8 “LANDLORDS”) had terminated property management services with RESPONDENT and
9 his management firm on April 11, 2025, and transferred those services to Ms. Leigh’s firm,
10 RentMax Property Management (“RentMax”), but that RESPONDENT had failed to
11 transfer to RentMax the relevant property management records and security deposits.
12 [NRED0002-0003]

13 3. The LANDLORDS owned seven (7) residential properties (by Mr. Pham,
14 individually), and two (2) residential properties (by Mr. Pham and Cristina Balderrama
15 together), for a total of nine (9) residential properties, all located in Clark County, Nevada
16 (“Managed Properties”), and all, prior to the transfer to RentMax, under property
17 management by RESPONDENT. [NRED0002-0003; NRED0070-0071; NRED 0106-0107]

18 4. All of LANDLORD’S Managed Properties are part of a Housing Assistance
19 Program through the Southern Nevada Regional Housing Authority and federal Section 8
20 governance, and all required documented assignment of management responsibilities by
21 RESPONDENT upon the transfer to RentMax. [NRED0042-0069]

22 5. On June 2, 2025, The Division received a Complaint in the form of a Statement
23 of Fact from Tricia Leigh, of RentMax (“COMPLAINT”). [NRED0002-0003]

24 6. On June 9, 2025, The Division sent an email to RESPONDENT, informing
25 RESPONDENT that the Division had received the COMPLAINT, and attached a copy of
26 that COMPLAINT to the email. The Division’s email requested that RESPONDENT
27 confirm that the issues had been resolved and the manner of resolution, in lieu of the
28 Division opening a case against RESPONDENT. [NRED0103-0104]

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2 7. The Division, not having received a reply, followed up with an email to
3 RESPONDENT on June 13, 2025, and inquired what action RESPONDENT has taken, or
4 would be taken, to address the issues raised in the COMPLAINT. [NRED0105]

5 8. On June 18, 2025, The Division emailed COMPLAINANT, inquiring whether
6 RESPONDENT had cooperated and provided a full exchange of requested documents and
7 transfer of security deposits; COMPLAINANT replied to The Division, by email on June
8 20, 2025, stating that the RESPONDENT had provided copies of the leases to the
9 LANDLORDS, rather than RentMax, but that RESPONDENT had yet to provide other
10 critical transfer items: Ledgers; Keys; Move-in condition forms; Move-in key receipts;
11 Tenant contact information forms; and the transfer of Tenant security deposits.
12 [NRED0106-0107]

13 9. On July 3, 2025, The Division issued a letter to RESPONDENT informing him
14 that The Division had now opened a case for investigation and requiring RESPONDENT
15 to provide to The Division an affidavit and a complete copy of all broker files for all
16 properties owned by LANDLORDS, no later than July 17, 2025, and enclosed various
17 attachments as referenced in the letter. [NRED0109]

18 10. The Division also emailed RESPONDENT its July 3, 2025, letter, on that date,
19 together with the COMPLAINANT'S Statement of Fact, Affidavit and a Sworn Declaration
20 form, together with the recited attachments. [NRED0109]

21 11. Having received no timely response, The Division issued an email on August
22 1, 2025, in an email to Respondent, noting that no documents had been received.
23 [NRED0117-0118]

24 12. In reply to the foregoing email, also on August 1, 2025, RESPONDENT
25 indicated that the email had been "Received" and that as to the obligations, RESPONDENT
26 in his email stated, "Will do." [NRED0117]

27 13. On August 7, 2025, the Division received a Statement of Fact from one of the
28 affected landlords, Mr. Pham, setting forth many of the same issues outlined in the

1 COMPLAINANT'S Statement of Fact and as otherwise acknowledged by RESPONDENT
2 during RESPONDENT'S communications with the Division. [NRED0070-0071].

3 14. Complainant Mr. Pham's Statement of Fact/Complaint asserted that
4 RESPONDENT failed to remit rental payments to Pham, turn over security deposits to
5 RentMax, and facilitate the delivery of other landlord-tenant forms and documents to
6 RentMax. [NRED0070-0071]

7 15. Not having received the requested documents, The Division followed up the
8 previous letter with a new letter, dated August 18, 2025, reminding RESPONDENT that
9 the failure to cooperate and provide requested affidavit and documents indicated violations
10 of NRS 645.635 (6), and NAC 645.680 (3); the letter also included in bold-type: "**Please**
11 **respond to this inquiry by September 1, 2025 in order to avoid potential**
12 **disciplinary action.**" (Emphasis in original.) This letter was sent by certified mail, return
13 receipt requested, to Edward Holmes, at his business address, and the card was signed on
14 August 21, 2025. [NRED0110-0113]

15 16. On August 18, 2025, The Division sent RESPONDENT an email with this
16 letter and received an email reply by RESPONDENT on August 18, 2025, stating that
17 RESPONDENT was "...working on these documents to turn in." [NRED0115-0116]

18 17. However, RESPONDENT never provided the documents he referenced in that
19 email.

20 18. The Division again emailed RESPONDENT, on September 15, 2025,
21 reminding RESPONDENT that nothing was received by The Division as of the most recent
22 due date of September 1, 2025. [NRED 0114-0115]

23 19. RESPONDENT replied with an email to the Division, dated September 15,
24 2025, apologizing for delays, but otherwise providing nothing in response to The Division's
25 standing requests. [NRED0114]

26 20. On October 23, 2025, the Division sent RESPONDENT an NRS 233B letter,
27 describing violations of NRS 645.633 1 (h), pursuant to NAC 645.605 (11)(a) and (b); and
28 NRS 645.635 (6). This letter was mailed certified mail, return receipt requested, to

1 RESPONDENT'S business address, and his home address; to date, RESPONDENT has
2 made no response. [NRED0123-0126].

3 **VIOLATIONS OF LAW**

4 RESPONDENT has committed the following violations of law:

5 1. RESPONDENT violated NRS 645.633 1 (h) pursuant to NAC 645.605
6 (11)(a) and (b) by committing gross negligence in the handling of matters with respect to
7 property management of nine properties RESPONDENT managed for his client Tai Pham.

8 2. RESPONDENT violated NRS 645.635 (6) by failing to produce to the
9 Division documents, books and/or records under its control with respect to his client's nine
10 rental properties under management by RESPONDENT.

11 **DISCIPLINE AUTHORIZED**

12 Pursuant to NRS 645.630, the Commission is empowered to impose an
13 administrative fine of up to \$10,000 per violation and suspend, revoke, or place conditions
14 on RESPONDENT'S license if warranted.

15 Additionally, under NRS 622.400, the Commission is authorized to impose costs of
16 the proceedings upon RESPONDENT, including investigative costs and attorney's fees, if
17 the Commission otherwise imposes discipline on RESPONDENT.

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

20 **NOTICE OF HEARING**

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

25 **THE HEARING WILL TAKE PLACE** on May 5, 2026, commencing at 9:00
26 a.m., or as soon thereafter as the Commission is able to hear the matter, and each
27 day thereafter commencing at 9:00 a.m. through May 7, 2026, or earlier if the
28 business of the Commission is concluded. The Commission meeting will be held

1 on May 5, 2026, at the Nevada State Business Center, 3300 W. Sahara Avenue, 4th
2 Floor, Nevada Room, Las Vegas, Nevada 89102 with video conferencing to the
3 Nevada Division of Insurance, 1818 College Parkway, Suite 103, Carson City,
4 Nevada 89706. The Commission meeting will continue each day thereafter
5 commencing at 9:00 a.m. through May 7, 2026, until the business of the
6 Commission is concluded.

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

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

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

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

6 The purpose of the hearing is to determine if the Respondent has violated NRS 645
7 and/or NAC 645 and if the allegations contained herein are substantially proven by
8 the evidence presented and to further determine what administrative penalty is to be
9 assessed against the RESPONDENT, if any, pursuant to NRS 645.633 1 (h) pursuant to
10 NAC 645.605 (11)(a) and (b); and NRS 645.635 (6).

11
12 DATED the 1st day of April, 2026.

13
14 State of Nevada
15 Department of Business and Industry
16 Real Estate Division

17 By: 
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