

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Case No. 2025-929

Petitioner,

FILED

vs.

APR 02 2026

EDWARD HOLMES,
S.0175875 (Closed);
B.1002896.LLC (Inactive);
PM.0167123.BKR (Expired),

REAL ESTATE COMMISSION
BY 

Respondent.

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 EDWARD HOLMES ("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 NRS 645.806 (3), and the discipline to be imposed, if violations of law are proven.

JURISDICTION

RESPONDENT, at all relevant times mentioned in this Complaint, was actively licensed, first as a Salesperson (S.0175875), then as a Broker (B.1002896.LLC) and held a property management permit (PM.0167123.BKR). RESPONDENT is, therefore, subject to the jurisdiction of the Division and the Commission, and the provisions of NRS Chapter 645 and NAC Chapter 645.

1 **FACTUAL ALLEGATIONS**

2 1. At all times relevant to this Complaint, RESPONDENT was registered with
3 NRED, first as a salesperson with Elite Realty, then, as of December 2022, as broker of
4 record with View Point Reality. [Exh. B; NRED0089-0090].

5 **Blanca and Kenneth Stepter Complaint- 245 N. 18th St. & 3500 Mercury St.**

6 2. On October 28, 2025, the Division received a Statement of Fact from
7 COMPLAINANT Blanca Stepter (“Complainant Stepter”), alleging that they did not
8 receive rental payments for their tenant-occupied rental properties, 245 N. 18th St., Unit
9 C, Las Vegas, NV 89101 (“245 N. 18th St.”) and 3500 Mercury St., Unit C, North Las Vegas,
10 NV 89030 (“3500 Mercury St.”), both managed by RESPONDENT, for rental payments
11 from 2024 to 2025 that he collected but failed to deposit into their accounts. [Exh. A;
12 NRED0002-0003;0006-0009].

13 3. On October 2, 2025, Complainant Stepter sent correspondence to
14 RESPONDENT requesting the deposit of collected rent payments for the properties
15 amounting in \$6,555.00 for 245 N. 18th St. Unit C and \$9,835.00 for 3500 Mercury St. Unit
16 C. [Exh. A; NRED0006-0009].

17 4. The October 2, 2025, correspondence noted “numerous attempts to contact
18 [RESPONDENT] via telephone call, text, [and] email” [Exh. A; NRED0006].

19 **Communications between RESPONDENT and Division**

20 5. On May 30, 2025, the Division sent a Letter of Instruction to RESPONDENT
21 relating to a separate investigation, Case 2024-1094, noting the Division’s ability to enforce
22 disciplinary action for subsequent future conduct. [Exh. B; NRED0096-0097].

23 6. On November 7, 2025, the Division sent correspondence to RESPONDENT
24 requesting the submission of an affidavit addressing the allegations stated in a complaint
25 for case number 2025-929, to be completed by November 21, 2025. [Exh. B; NRED0091].

26 7. On November 24, 2025, the Division sent follow-up correspondence to
27 RESPONDENT confirming the lack of response to correspondence sent on November 7,
28 2025, and reiterating its request for response and documents, as well as consequences for

1 non-response. [Exh. B; NRED0092-0094].

2 8. On December 4, 2025, RESPONDENT submitted response via form 652
3 affidavit, indicating that he did not contest the claims from Complainant Stepter and noted
4 that he would pay back all monies owed, and provided seventy-eight (78) pages of
5 documents regarding the 245 N. 18th St. and 3500 Mercury St. properties. [Exh. C;
6 NRED0099-0102].

7 9. On January 20, 2026, the Division sent a follow-up request to RESPONDENT
8 for owner statements and tenant ledgers for the 245 N. 18th St. and 3500 Mercury St.
9 properties, due January 30, 2026. [Exh. B; NRED0095].

10 10. RESPONDENT did not send the owners statements and tenant ledgers for
11 the properties, by the deadline set forth in the Division's January 20, 2026, letter.

12 11. On March 10, 2026, the Division sent, via Certified Mail, an NRS 233B letter
13 notifying the RESPONDENT that it would pursue disciplinary action in a hearing before
14 the Commission for potential violations of NRS 645 and NAC 645. [Exh. D; NRED0183-
15 0184].

17 VIOLATIONS OF LAW

18 RESPONDENT has committed the following violations of law:

19 1. RESPONDENT violated NRS 645.630(1)(f) on two (2) separate and distinct
20 counts by failing, within a reasonable time, to account for or to remit rents as to each of the
21 following properties:

22 a. 245 N. 18th St., Unit C;

23 b. 3500 Mercury St., Unit C.

24 2. RESPONDENT violated NRS 645.633(1)(h) pursuant to NAC 645.605(6) by
25 committing gross negligence and/or incompetence in breaching his obligation of absolute
26 fidelity to his principals' interest when he failed to timely communicate with, and remit
27 monies due to, his clients as to each of the following properties:

28 a. Blanca Stepter- 245 N. 18th St., Unit C;

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

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

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

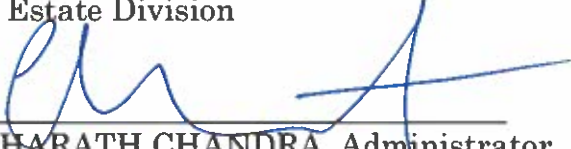
22 You have the right to request that the Commission issue subpoenas to compel
23 witnesses to testify and/or evidence to be offered on your behalf. In making the request,
24 you may be required to demonstrate the relevance of the witness' testimony and/or
25 evidence. Other important rights you have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

27 The purpose of the hearing is to determine if the Respondent has violated NRS 645
28 and/or NAC 645 and if the allegations contained herein are substantially proven by

1 the evidence presented and to further determine what administrative penalty is to be
2 assessed against the RESPONDENT, if any, pursuant to NRS 645.235, 645.633 and or
3 645.630.

4 DATED the 2nd day of April, 2026.

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

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

12 AARON D. FORD
13 Attorney General

14 By: /s/ Sebastian Ross
15 SEBASTIAN O. ROSS (Bar No. 16444)
16 Deputy Attorney General
17 1 State of Nevada Way, Ste. 100
18 Las Vegas, Nevada 89119
19 s.ross@ag.nv.gov
20 (702) 486-2389
21 *Attorneys for Real Estate Division*