BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

SHARATH CHANDRA, Administrator, REAL ESTATE DIVISION, DEPARTMENT OF BUSINESS & INDUSTRY, STATE OF NEVADA, Petitioner, vs. TALON MICHAEL BEDJOHN, (S.0173620- Expired) Respondent.	**Case No. 2024-996** FILED AUG 2 1 2026 REAL ESTATE COMMISSION BY

FIRST AMENDED[1]

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 TALON MICHAEL BEDJOHN ("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 645.235 and/or NRS 622.400, and the discipline to be imposed, if violations of law are proven.

JURISDICTION

RESPONDENT, at all relevant times pertinent to the violations in this Complaint, held an active Nevada real estate salesperson license # S.0173620 and is therefore subject to the jurisdiction of the Division and the Commission, and the provisions of NRS chapter 645 and NAC chapter 645.

[1] Amended language identified in **bold and underline.**

FACTUAL ALLEGATIONS

1. RESPONDENT TALON MICHAEL BEDJOHN ("RESPONDENT") has been a licensed salesperson in Nevada since September 20, 2013. [NRED0064].

2. On October 24, 2024, the Division received a Statement of Fact from COMPLAINANT Teresa Polk-Henderson regarding the conduct of RESPONDENT, with whom she signed a lease agreement to rent property personally owned by RESPONDENT, 9148 Watermelon Seed Ave., Las Vegas, NV 89143, ("the Property") from July 1, 2024, for a one-year lease, for which she paid a $3,600.00 in security and other deposits. [NRED0002-0003; 0009; 0026].

3. The rental application and residential lease agreement were prepared on forms generated with eXp Realty letterhead, generated by RESPONDENT as the "Designated Property Manager." [NRED0004-0008; 0026-0039; 0036].

4. RESPONDENT has never possessed a property manager permit issued by the Division.

5. COMPLAINANT contends that, upon move-in, RESPONDENT left not only the agreed-upon furnishings, but additional personal property in the closets and bedrooms, as well as a vehicle in the garage, all of which remained in the property for over a month. [NRED0002-0003; 0111].

6. COMPLAINANT further contends that in September 2024 she was notified that the Property was being foreclosed upon by an individual other than RESPONDENT and, when she contacted RESPONDENT regarding the foreclosure, he denied the validity of the foreclosure action. [NRED0002-0003].

7. However, on October 4, 2024, COMPLAINANT was served with a Notice of Change of Ownership Following Foreclosure and a 7-Day Eviction Notice for Failure to Pay Rent by the new owner of the Property, Lancer Properties. [NRED0048-0051].

8. On November 5, 2024, Lancer Properties issued COMPLAINANT a Thirty-Day "No Cause" Notice to Quit and, on January 2, 2025, issued COMPLAINANT a Five-Day Notice of Unlawful Detainer. [NRED0052-0053].

9. On January 14, 2025, COMPLAINANT was issued an Order for Summary Eviction, evicting her from the Property on January 21, 2025. [NRED0056].

10. COMPLAINANT claims that although she requested return of her $2,500.00 security deposit, RESPONDENT has not returned that deposit to her. [NRED0002-0003].

11. On September 5, 2025, Division Investigator Sonia Garcia-Solorio issued an open investigation letter to RESPONDENT regarding the COMPLAINANT'S Statement of Fact and requesting his response and supporting materials via affidavit by September 19, 2025. [NRED0067].

12. That same day, the Division Investigator also sent an open investigation letter to RESPONDENT's Broker, Spencer Walden of eXp Realty, requesting his response and supporting materials via affidavit by September 19, 2025. [NRED0066].

13. On September 11, 2025, RESPONDENT sent the Division his response via the affidavit form and a copy of the signed lease agreement and property tax report. [NRED 0071-0075].

14. In his response, RESPONDENT contended that COMPLAINANT disregarded lease terms prohibiting smoking on the property and that COMPLAINANT failed to pay rent starting October 1, 2024, breaching the terms of her lease. [NRED0073].

15. On September 25, 2025, after receiving a one-week extension to provide his response, broker Spencer Walden sent his responsive affidavit and 28 pages of documents, to Investigator Garcia-Solorio. [NRED0077-0111].

16. Broker Walden stated that he was first made aware of this matter by the Division Investigator's letter and that RESPONDENT was currently in inactive status and no longer affiliated with eXp Realty. [NRED0083].

17. Broker Walden also asserted that RESPONDENT failed to provide him with a copy of the Form 652 Statement of Fact, Form 770 Sworn Statement, or any supporting transaction documentation despite multiple requests for same, and failed to upload any relevant documents into eXp Realty's compliance system, as required by company policy. [NRED0083].

18. Broker Walden further states in his affidavit that his brokerage had no evidence of lease violations that would justify withholding of the lease deposit, and that it was his brokerage's position that RESPONDENT should have refunded the security deposit to the tenant or transferred those funds to the new owner of record. [NRED0083].

19. On September 29, 2025, Investigator Garcia-Solorio sent RESPONDENT a follow-up Request for Information letter, asking for a copy of the lease and any signed addenda; proof of notification or disclosures of default or foreclosure, either before or after lease was signed; and that he clarify, in writing, the outcome of all security deposits upon completion of the foreclosure of the Property, with a deadline of October 7, 2025. [NRED0069].

20. On September 30, 2025, RESPONDENT emailed Investigator Garcia-Solorio his response, stating that the lease was "locked in document storage" and unavailable to him; confirming that he provided no proof or notification of foreclosure; and that he withheld the security deposit because "past tenants have broken lease agreement and non-smoking rental restrictions." [NRED0076].

21. On December 4, 2025, the Division mailed an NRS 233B letter via certified mail to RESPONDENT, stating the Division's intent to file a complaint with the Commission for violations of NRS 645 and NAC 645. [NRED00113-0114].

VIOLATIONS OF LAW

RESPONDENT has committed the following violations of law:

1. RESPONDENT willfully and/or knowingly violated **NAC** 645.650(2) by failing to provide paperwork regarding this lease transaction to the broker with whom he was associated within 5 calendar days after execution by the parties.

2. RESPONDENT violated NRS 645.635(1)(a) by making material misrepresentations in preparing the rental application and rental lease agreement, including, but not limited to, using eXp Realty forms and letterhead identifying RESPONDENT as "designated property manager" when the property was not being managed by eXp Realty and RESPONDENT did not hold a property management permit.

3. RESPONDENT willfully and knowingly violated NRS 645.633(1)(h) pursuant to NAC 645.605(6) and breached his obligation to deal fairly with all parties to a real estate transaction by failing to directly and timely inform the tenants of the Property that it was subject to default, in the process of foreclosure, and was sold in a foreclosure sale on October 3, 2024.

DISCIPLINE AUTHORIZED

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

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

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

NOTICE OF HEARING

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

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

STACKED CALENDAR: Your hearing is one of several hearings scheduled at the same time as part of a regular meeting of the Commission that is expected to last from November 17, 2026, through November 19, 2026, or earlier if the business of the Commission is concluded. Thus, your hearing may be continued until later in the day or from day to day. It is your responsibility to be present when your case is called. If you are not present when your hearing is called, a default may be entered against you and the Commission may decide the case as if all allegations in the complaint were true. If you have any questions, please call Amy Reveyrand, Commission Coordinator, at (702) 486-4606.

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

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

You have the right to request that the Commission issue subpoenas to compel witnesses to testify and/or evidence to be offered on your behalf. In making the request, you may be required to demonstrate the relevance of the witness' testimony and/or evidence. Other important rights you have are listed

in NRS 645.680 through 645.990, NRS Chapter 233B, and NAC 645.810 through 645.875.

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

DATED the 19 day of August, 2026.

State of Nevada
Department of Business and Industry
Real Estate Division

By: _____
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