BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

SHARATH CHANDRA, Administrator, REAL ESTATE DIVISION, DEPARTMENT OF BUSINESS & INDUSTRY, STATE OF NEVADA, Petitioner, vs. JENNIFER LEE, (S.0191685.LLC), Respondent.	**Case No. 2025-546**

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 JENNIFER LEE ("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 645.630 and/or NRS 622.400, 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 as a Salesperson. (S.0191685.LLC) RESPONDENT is, therefore, subject to the jurisdiction of the Division and the Commission, and the provisions of NRS Chapter 645 and NAC Chapter 645.

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FACTUAL ALLEGATIONS

1. At all times relevant to this Complaint, RESPONDENT held a real estate salesperson's license.(S.0191685.LLC), as an agent for Berkshire Hathaway Homeservices Nevada Properties ("Berkshire Hathaway"). [NRED0001-0068]

2. On June 19, 2025, the Division received a Statement of Fact from Kristen Makhathini ("COMPLAINT" and, as to Ms. Makhathini, "COMPLAINANT"), providing, among other matters, the following allegations: (1) that the RESPONDENT had represented a client, Angela Chandna on the purchase of two properties in 2024, 2215 Fish Hawk Avenue, Las Vegas, Nevada ("Fish Hawk"); and 11840 River Hawk Avenue, Las Vegas, Nevada ("River Hawk") (together, the "Two Rental Properties"), and RESPONDENT promised a commission rebate which she was not authorized to do; (2) that the RESPONDENT misrepresented herself as a licensed property manager, yet prepared and executed with her client a property management agreement while charging her client management fees; additionally, RESPONDENT prepared residential leases for her client's tenants to sign, collecting rents and deposits from tenants but then failed to remit those funds to the client; and (3) other allegations, not relevant to the complaint herein. [NRED0001-0061]

3. During RESPONDENT'S agency with Berkshire Hathaway, RESPONDENT was engaged by Angela Chandna, as a client ("Client"), in connection with the proposed purchase of the Two Properties. [NRED0001-0006; NRED 0062-0063]

4. The Client's purchase of the Two Properties closed in October, 2024 and in December, 2024. [NRED0001-0006; NRED 0075-0090]]

5. In connection with these transactions, RESPONDENT made an agreement with her client to rebate the client 1% of the purchase price for Fish Hawk, totaling, $8,199.50 However, RESPONDENT never confirmed nor communicated the fact of this agreement to rebate $8,199.50 with her broker. [NRED0001-0007]

6. Subsequent to the two closings, RESPONDENT, who did not hold a property management permit and was not permitted by her broker to manage rental properties,

proceeded nonetheless to manage the Client's Two Properties. [NRED0001-0061]

7. RESPONDENT elected to draft, without authority from her broker, property management agreements for the Two Rental Properties. [NRED0008-0027; NRED0062-0063]

8. RESPONDENT elected to draft, without authority from her broker, lease agreements for the Two Rental Properties. [NRED0001-0006; NRED0028-0055]

9. RESPONDENT, without authority from her broker, collected rent payments from tenants at the Two Rental Properties. [NRED0001-0006; NRED 0056-0063]

10. RESPONDENT further directed some of these rental payments to her individual PayPal®, or her bank accounts; RESPONDENT did not direct rent payments to a proper trust account required for such payments. [NRED0001-0006; NRED 0056-0063]

11. RESPONDENT, until January 15, 2026, managed both the Fish Hawk and the River Hawk rental homes for the client. [NRED0001-0006; NRED 0056-0063]

12. At no time relevant to RESPONDENT'S management of the Two Properties did RESPONDENT request or receive authority from her broker permitting RESPONDENT to process rental agreements and leases or to manage the Two Rental Properties. [NRED0001-0006; NRED 0062-0063]

13. RESPONDENT assessed the Client charges for management fees and did not submit those fees to her broker; simultaneously, RESPONDENT never at any time during her actions as a property manager possessed a property management permit, nor any approval from her broker to perform such services. [NRED001-0006].

14. RESPONDENT continued to collect rent from her client's tenants, which rent was then paid directly to her personal PayPal® or bank accounts, but then failed to tender all rent received to her client. [NRED001-0006; NRED 0056-0063].

15. None of the rental payments received by RESPONDENT were deposited into a proper trust account. [NRED0001-0006; NRED 0056-0063].

16. In total, RESPONDENT retained and failed to tender over to her client the sum of $15,866.76, representing fees, charges and rent, and a repayment of an improper

$1,000 leasing fee due her client. There remains an additional claim by the Client against RESPONDENT for the rebate fee on Fish Hawk in the sum of $8,199.50. [NRED0003-0007].

17. RESPONDENT'S broker terminated RESPONDENT'S agency relationship shortly after learning of RESPONDENT'S actions with respect to the client, and facts surrounding her undisclosed property management of the Two Rental Properties, the failure to confirm broker approval of the rebates, and the drafting of property management documents and personal handling of payments and fees. [NRED0001-0002; NRED 0073]

18. RESPONDENT continues working as a real estate salesperson, and is now working with Realty One Group, Inc., Summerlin office, in Las Vegas. [NRED0074]

19. On or about July 18, 2025, the Division sent to Berkshire Hathaway, RESPONDENT's then-broker, a letter, requesting information through an affidavit related to the COMPLAINT. [NRED0066]

20. On or about July 29, 2025, the Division sent a letter and email to RESPONDENT, with a copy of the Complaint, requesting her response to the Complaint via an affidavit, Form 652. [NRED0067]

21. On or about August 18, 2025, RESPONDENT replied to the Division's letter, by sworn affidavit, on NRED Form 652, acknowledging that RESPONDENT performed property management duties and that RESPONDENT received direct rental and other payments while working for her client; RESPONDENT did not address or otherwise deny that she had made a secret agreement to rebate her client on the purchases of Fish Hawk. Additional correspondence was also sent to RESPONDENT on July 29, 2026, to which no response has been made. [NRED0062-0063; 0071-0072]

22. On April 21, 2026, the Division sent RESPONDENT a 233B letter, to RESPONDENT'S last known address, describing violations of NAC 645.605 (1); NRS 645.235 (1)(a); NRS 645.280 (2); and NRS 645.630 (1)(b); and stating that, pursuant to NRS 645.630, the Commission, upon finding violations, may impose administrative fines of up to $10,000 per violation NRS 645.635 (6). [NRED0069-0070]

VIOLATIONS OF LAW

RESPONDENT has committed the following violations of law:

1. RESPONDENT violated NRS 645.633 (1)(i) by engaging in conduct that is deceitful, dishonest, or fraudulent, including misrepresenting herself as a property manager, collecting client payments without use of a trust account, and entering into commission rebate agreements without consent of RESPONDENT'S broker.

2. RESPONDENT violated NRS 645.235 (1)(a) by failing to hold a property management permit while performing duties exclusively under the domain of a licensed property manager.

3. RESPONDENT violated NRS 645.280 (2) by accepting compensation directly from the client, rather than through her broker.

4. RESPONDENT violated NRS 645.280 (1) by forming a private agreement to rebate 1% of the purchase prices to the client (agreeing to share a portion of her commission with an unlicensed person), without ever obtaining broker authorization and further, by failing to provide the agreed upon payment to the client buyer.

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.

Pursuant to NRS 645.235 (2) the Commission is empowered to impose an administrative fine of up to $5,000 or the amount of any gain or economic benefit that the person derived from the violation, whichever amount is greater, for any unpermitted activity.

Additionally, under NRS 622.400, the Commission is authorized to impose costs of the proceedings 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 August 11, 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 August 13, 2026, or earlier if the business of the Commission is concluded. The Commission meeting will be held on August 11, 2026, at the Nevada Division of Insurance, 1818 College Parkway, Suite 103, Carson City, Nevada 89706, with video conferencing to the Nevada State Business Center, 3300 W. Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102. The Commission meeting will continue each day thereafter commencing at 9:00 a.m. through August 13, 2026, until the business of the Commission is concluded.

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 August 11, 2026, through August 13, 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 645.633 1 (h) pursuant to NAC 645.605 (11)(a) and (b); and NRS 645.635 (6).

DATED the 9 day of July, 2026.

State of Nevada
Department of Business and Industry
Real Estate Division

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