BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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| SHARATH CHANDRA, Administrator, REAL ESTATE DIVISION, DEPARTMENT OF BUSINESS & INDUSTRY, STATE OF NEVADA,<br><br>Petitioner,<br><br>vs.<br><br>ILONA MELNICHENKO, (S.0199391 – Active), (PM.0168517 - Active),<br><br>Respondent. | **Case No. 2024-772**<br><br>FILED<br>OCT 15 2026<br>REAL ESTATE COMMISSION<br>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 ILONA MELNICHENKO ("RESPONDENT" or "RESPONDENT MELNICHENKO") 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, NRS 645.630, and/or NRS 622.400, and the discipline to be imposed, if violations of law are proven.

**JURISDICTION**

RESPONDENT MELNICHENKO, was licensed as a Nevada real estate salesperson (S.0199391) and held a valid property management permit (PM.0168517) at all relevant times pertinent to the violations in this Complaint 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. John Spisso ("Spisso") is an owner and/or managing member of Flower Rentals LLC dba Casago Henderson ("Flower Rentals LLC" or "Casago"). [Exh. B; NRED0212-0214].

2. Casago, at all times relevant to this Complaint, provided vacation rental platform services and property management services for properties owned by client owners. [Exh. B; NRED0223-0269].

3. Spisso has never held a license or permit issued by the Nevada Real Estate Division. [Exh. A, NRED0010-0011; NRED0022; Exh. B, NRED0216].

4. RESPONDENT MELNICHENKO has been licensed as a real estate salesperson in Nevada since April 2023 (S.0199391) and holds a Nevada property management permit (PM.0168517); her license is registered with Knapp Realty. [Exh. B; NRED0212-0214].

5. RESPONDENT MELNICHENKO is also an owner and/or managing member of Casago with Spisso. [Exh. B; NRED0223-0268].

6. RESPONDENT MELNICHENKO has never been registered with the Division as a licensed property manager for Flower Rentals LLC or Casago under NRS 645. [Exh. B; NRED0274-0278].

7. At all times relevant to this Complaint, Debi A. Handley ("Handley") is a licensed Nevada broker (B.0036986.CORP) and property management permit holder (PM.0165179.BKR) who is broker of record for Knapp Realty. [Exh. B; NRED0210-0211].

8. Handley has never been registered with the Division as a broker of record for Flower Rentals LLC or Casago under NRS 645. [Exh. B; NRED0210; 0282].

9. On or about August 27, 2024, the Division received a Statement of Fact, including 205 pages of attachments, from COMPLAINANTS Todor Stoilov and Asmeen Olila-Stoilov, (collectively, the "COMPLAINANTS") against RESPONDENT MELNICHENKO, Spisso, and Handley regarding the management of their property at 8729 Arizona Poppy Ave., Las Vegas, NV 89117 (the "Subject Property") by Casago.[1] [Exh. A; NRED0001-0207].

10. COMPLAINANTS' allegations against Casago included:

1) inconsistent rental agreements, with adjusted dates and noticeable errors;

2) discrepancies in financial documentation, in that the owners statements did not match gross amount of reservations;

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[1] Disciplinary cases have been contemporaneously filed against Mr. Spisso and Ms. Handley in Case Nos. 2024-773 and 2024-771, respectively.

3) failure to provide documentation, such as vendor invoices, signed leases, and guest payment receipts, in a timely manner;

4) vague explanation for rental discounts;

5) management fee issues;

6) "additional owner income" issue and Casago's threat of legal damages to property owners;

7) unfounded allegations against property owners regarding their occupancy at the property;

8) unauthorized charges/reimbursements;

9) Mr. Spisso acting as a property manager without a proper license, and

10) denial of listing agent/broker responsibility, e.g. no duties owed before signing contract.

[Exh. A; NRED0002-0011].

11. Neither RESPONDENT MELNICHENKO nor Handley presented the COMPLAINANTS with a "Duties Owed by a Nevada Real Estate Licensee" disclosure before they entered into any management agreement for the subject property. [Exh. A; NRED0011].

12. The COMPLAINANTS alleged that "all communications and rent negotiations were handled solely by Mr. Spisso, not by Ms. Melnichenko or Ms. Handley." [Exh. A; NRED0011].

13. Spisso personally responded to several email and text communications with the COMPLAINANTS and renters of the Subject Property including, but not limited to, rent negotiations, prospective guest screening, and third-party vendors/repairmen. [Exh. A; NRED0042; 0054; NRED0090; NRED0142-0207].

14. Knapp Realty, RESPONDENT MELNICHENKO, and Handley listed the Subject Property on MLS on November 1, 2023. [Exh. C; NRED0299-0303].

15. RESPONDENT MELNICHENKO advertised the subject property for rental on several listing websites as the named "listing agent" through Knapp Realty. [Exh. A; NRED0026-0033].

16. When COMPLAINANTS requested copies of lease agreements to both Spisso and RESPONDENT MELNICHENKO on July 9, 2024, it was Spisso who initially replied, stating "the

signed documents from the guests are stored in our files and are not for release. However here is the generic copy that they've all signed, and I can confirm all documentation was completed." [Exh. A; NRED0042-0047].

17. Knapp Realty, RESPONDENT MELNICHENKO, and Handley terminated the MLS listing on July 11, 2024. [Exh. C; NRED0303].

18. The COMPLAINANTS then directly requested documentation from RESPONDENT MELNICHENKO via email on July 11, 2024, including all rental agreements/contracts, security deposit receipts, and documentation associated with reservations made through booking platforms. [Exh. A; NRED0048-0049].

19. Spisso replied via email on July 12, 2024, that all documents could be found on the Owner Portal. [Exh. A; NRED0056].

20. That same day, COMPLAINANTS reported that the Owner Portal did not contain the signed lease agreements. [Exh. A; NRED0057].

21. RESPONDENT MELNICHENKO replied via email with copies of the rental agreements, noting: "I wanted to clarify that **I am not** your real estate agent of record, and no agreements to this effect have been signed. My role is currently that of your property manager, and I will continue in this capacity on or before August 19, 2024, when our agreement concludes." [Exh. A; NRED0058-0079].

22. The rental agreements provided by RESPONDENT MELNICHENKO were all post-dated July 11, 2024, which does not reflect the actual dates the tenants rented the Subject Property. [Exh. A; NRED0071, 0075, 0079].

23. On August 30, 2024, the Division issued open investigation letters to RESPONDENT MELNICHENKO, Handley, and Spisso (collectively, the "RESPONDENTS") regarding the COMPLAINANTS' Statements of Fact and requesting their respective responses via affidavit, as well as all documentation and transaction files concerning the subject property, with a deadline of September 13, 2024. [Exh. B; NRED00217-0222].

24. On September 24, 2024, the RESPONDENTS, through their attorney, Johnathon Fayeghi, Esq., of the law firm Sklar Williams, submitted their response to the Division's open investigation letters ("the Response"). [Exh. C; NRED0285-0289; 0290-0417].

25. The Response stated that "Flower Rentals provides vacation rental hosting platform services to its property owner customers. Flower Rentals does not provide property management services, however it offers its owner customers property management services for their vacation rentals through Knapp Realty's licensed property manager, Ms. Melnichenko." [Exh. C; NRED0286].

26. With regard to the allegation that Spisso performed property management tasks without a license, the Response stated that "at no point in time did Mr. Spisso ever represent himself as a licensed real estate salesperson or property manager. At the time of entering into the Agreement, Ms. Melnichenko made it absolutely clear that she was the license property manager who would be providing all property management services and that Mr. Spisso's role… was to provide assistance with the Casago vacation rental platform and the reservations and bookings of the Property through the Online Travel Agency platforms." [Exh. C; NRED0286].

27. Copies of the three rental agreements with corrected dates were provided with the Response. [Exh. C;NRED0314-320; 0332-0337; 0347-0352].

28. The Response also stated RESPONDENT MELNICHENKO received a total of $10,489.00 in compensation from Flower Rentals, LLC, through seven (7) checks from January 16, 2024, through August 19, 2024. [Exh. C; NRED0286].

29. On July 8, 2025, the Division issued Cease-and-Desist Orders to the RESPONDENTS, including RESPONDENT MELNICHENKO. [Exh. C; NRED0270-0283].

30. The Cease-and-Desist Order issued to RESPONDENT MELNICHENKO stated that she is "not a licensed property manager for Flower Rentals LLC under NRS 645" and directed her to stop conducting "all property management activities as defined by NRS 645.6054 for properties being managed by Flower Rentals LLC dba Casago Henderson. Ms. Melnichenko may only perform licensed activity of any kind for Knapp Realty." [Exh. B; NRED0274-0278].

31. The Cease-and-Desist Order issued to Handley stated that she is "not a licensed broker for Flower Rentals LLC under NRS 645" and directed her to stop conducting "all broker activity as defined by NRS 534.030 and all property management activities as defined by NRS 645.6054 for properties being managed by Flower Rentals LLC dba Casago Henderson. Ms. Handley may only perform licensed activity of any kind for Knapp Realty." [Exh. B; NRED0279-0282].

32. The Cease-and-Desist Order issued to Spisso directed him to stop conducting "all property management activities as defined by NRS 645.6054 to include the management of all properties including short term rentals for Flower Rentals LLC dba Casago Henderson or any other position that requires a license in the State of Nevada from the Nevada Real Estate Division." [Exh. B; NRED0270-0273].

33. On July 26, 2025, the Division mailed an NRS 233B letter via certified mail to RESPONDENT MELNICHENKO, stating the Division's intent to file a complaint with the Commission for violations of NRS 645. [Exh. D; NRED0422-0424].

**VIOLATIONS OF LAW**

RESPONDENT MELNICHENKO has committed the following violation of law:

1. RESPONDENT MELNICHENKO violated NRS 645.235(1)(b) by knowingly assisting John Spisso, an unlicensed individual, in serving in the capacity of a property management permit holder, as defined by NRS 645.019, when he performed property management activities for the Subject Property through his role at Casago including, but not limited to, rent negotiations, prospective guest screening, and third-party vendors/repairmen, without first obtaining a property management permit or any pre-requisite real estate license.

2. RESPONDENT MELNICHENKO violated NRS 645.633(1)(h) pursuant to NRS 645.280(2) by accepting compensation from anyone other than her broker of record, Handley, for her work on the Subject Property.

3. RESPONDENT MELNICHENKO violated NRS 645.633(1)(h) pursuant to NRS 645.6057(2) by failing to exercise reasonable skill and care in timely disclosing material and relevant facts, data, or information regarding the Subject Property to the COMPLAINANTS, as soon as practicable.

4. RESPONDENT MELNICHENKO violated NRS 645.633(1)(h) pursuant to NAC 645.605(7) by failing to ensure that each agreement pertaining to the management of the Subject Property was contained in a written agreement signed by all parties and that each party had a copy of the written agreement.

5. RESPONDENT MELNICHENKO violated NRS 645.633(1)(h) pursuant to NRS 645.252(3)(a) and/or 645.6057(3) by failing to ensure that a "Duties Owed" property management disclosure pursuant to NRS 645.193 was issued to the COMPLAINANTS regarding the Subject Property.

**DISCIPLINE AUTHORIZED**

Pursuant to NRS 645.235(2), the Commission is empowered to impose an administrative fine not to exceed the amount of any gain or economic benefit that the person derived from the violation or $5,000, whichever amount is greater.

Additionally, under NRS Chapter 622, 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 to 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, through November 19, 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 15th day of October, 2026.

State of Nevada
Department of Business and Industry
Real Estate Division

By: _____

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