

FILED

SEP 18 2015

REAL ESTATE COMMISSION  
BY *[Signature]*

BEFORE THE REAL ESTATE COMMISSION  
STATE OF NEVADA

JOSEPH R. DECKER, Administrator,  
REAL ESTATE DIVISION, DEPARTMENT  
OF BUSINESS & INDUSTRY,  
STATE OF NEVADA,

Case No. 2014-4381  
2015-1537

Petitioner,

vs.

STIPULATION AND ORDER FOR  
SETTLEMENT  
OF DISCIPLINARY ACTION

BRADLEY LAWSON,

Respondent.

This Stipulation for Settlement of Disciplinary Action (Stipulation) is entered into between the Petitioner, State of Nevada, Department of Business and Industry, Real Estate Division (Division), through its Administrator, Joseph R. Decker, and Respondent, BRADLEY LAWSON ("Respondent" or "LAWSON").

JURISDICTION

1. Respondent stipulates and agrees that he was at all relevant times, licensed in Nevada by the Division as alleged in the Complaints. Respondent agrees that he is subject to Nevada Revised Statutes (NRS) Chapter 645 and Nevada Administrative Code (NAC) Chapter 645 and to the jurisdiction of the Division and the Commission.

SUMMARY OF FACTUAL ALLEGATIONS SET FORTH IN CASE NUMBER 2014-4381

2. RESPONDENT, at the relevant times mentioned in this Complaint, was licensed as a Broker and Property Manager, license numbers B.1001386.LLC and PM.0165669.BKR from May 22, 2014 to July 18, 2014 with Winners, LLC and from July 18, 2014 through present at Lawson Real Estate & Investments, and is currently in an active status and subject to the jurisdiction of the Division and the provisions of NRS chapter 645 and NAC chapter 645.

3. As part of Respondent's Original Licensing Application for a broker's license, Respondent submitted an experience verification form purportedly signed by Marty Zabib and one purportedly signed by Mark Caro.

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1 4. In fact, neither Mr. Zabib nor Mr. Caro signed the experience verification forms.

2 5. Mr. Zabib reviewed the experience verification form and confirmed that he did  
3 not sign the document. It was not his signature and it was notarized by a notary that he has  
4 not used.

5 6. Mr. Caro reviewed the experience verification form and confirmed that he did not  
6 sign the document. It was not his signature and it was purportedly notarized in Nevada. Mr.  
7 Caro lives and works in Flagstaff Arizona.

8 7. Respondent submitted forged documents to the Division in order to obtain a  
9 license.

10 **SUMMARY OF VIOLATIONS OF LAW ALLEGED IN CASE NUMBER 2014-4381**

11 8. For submitting the documents with the forged signature of Marty Zabib,  
12 RESPONDENT violated NRS 645.630(1)(a) by making a material misrepresentation and NRS  
13 645.633(1)(i) as such conduct constitutes deceitful, fraudulent or dishonest dealing.

14 9. For submitting the documents with the forged signature of Marc Caro,  
15 RESPONDENT violated NRS 645.630(1)(a) by making a material misrepresentation and NRS  
16 645.633(1)(i) as such conduct constitutes deceitful, fraudulent or dishonest dealing.

17 **SUMMARY OF FACTUAL ALLEGATIONS SET FORTH IN CASE NUMBER 2015-1537**

18 10. On April 13, 2015, Respondent entered into a plea agreement and plead guilty  
19 to two (2) counts of theft and forty (40) counts of forgery in Superior Court of the State of  
20 Arizona, County of Coconino, case number CR 2014-00807.

21 11. On May 18, 2015, the court found Respondent guilty of the above offenses  
22 based upon the plea agreement and sentenced him to three years probation and ordered  
23 restitution in the amount of \$65,000.

24 12. The above crimes are felonies relating to the practice of the Respondent and/or  
25 are crimes involving fraud, deceit, misrepresentation or moral turpitude.

26 13. Respondent has not notified the Division of the above plea of guilty.

27 14. On June 1, 2015 and June 16, 2015, Respondent was sent letters by the  
28 Division requesting an affidavit response.

1                    **SUMMARY OF VIOLATIONS OF LAW ALLEGED IN CASE NUMBER 2014-4381**

2            15.    RESPONDENT committed forty two (42) violations of NRS 645.633 (1)(d) by  
3 entering guilty pleas and being convicted of two (2) counts of theft and forty (40) counts of  
4 forgery which are felonies relating to the practice of the Respondent and/or are crimes  
5 involving fraud, deceit, misrepresentation or moral turpitude.

6            16.    RESPONDENT violated NRS 645.995 by failing to notify the Division not more  
7 than 10 days after plea of guilty.

8                    **DISCIPLINE AUTHORIZED**

9            17.    For each violation of NRS 645 and/or NAC 645, the Commission is empowered  
10 to impose an administrative fine of not more than \$10,000.00 per violation. For each violation  
11 of NRS 645 and/or NAC 645, the Commission is also empowered to suspend, revoke or place  
12 conditions on the license of Respondent. Pursuant to NRS 622.400, the Commission is  
13 authorized to impose the costs of this proceeding upon the Respondent, including  
14 investigative costs and attorney's fees.

15                    **SETTLEMENT**

16            18.    The Division was prepared to present its case based upon the Complaints filed  
17 with the Commission and the Respondent was prepared to defend against the Complaints.

18            19.    Respondent admits to the facts and violations of law as alleged in the  
19 Complaints. The Parties desire to compromise and settle the instant controversy upon the  
20 following terms and conditions.

21            20.    Respondent agrees that all of his licenses and permits are REVOKED and that  
22 he may not apply for any real estate license or permit in Nevada for 10 years from the  
23 effective date of this Order.

24            21.    Respondent agrees to pay to the Division Five Thousand (\$5,000.00) in an  
25 administrative fine within 12 months of the date of the Commission's Order Approving  
26 Stipulation, in accordance with the below schedule of installment payments.

27            22.    The first payment of \$420.00 shall be due within 30 days of the effective date of  
28 the Commission's Order Approving Stipulation. Then ten additional installment payments of

1 \$420.00 and one final installment payment of \$380.00, shall be due on the 15<sup>th</sup> day of each  
2 month following the initial payment, until the administrative fine is paid in full. No grace period  
3 is permitted. Any installment payment not actually received by the Division on or before its  
4 due date shall be construed as an event of default by the Respondent.

5 23. In the event of default, Respondent agrees that the unpaid balance of the  
6 administrative fine shall become immediately accelerated, and the unpaid balance, together  
7 with any attorney's fees and costs that may have been assessed, shall be due in full to the  
8 Division within ten calendar days of the date of default. Further, debt collection actions for  
9 unpaid monetary assessments in this case may be instituted by the Division.

10 24. The Division agrees not to pursue any other or greater remedies or fines in  
11 connection with Respondent's alleged conduct referenced herein.

12 25. Respondent and the Division agree that by entering into this Stipulation, the  
13 Division does not concede any defense or mitigation Respondent may assert and that once  
14 this Stipulation is approved and fully performed, the Division will close its file in this matter.

15 26. Respondent agrees that if the administrative fine is not paid within the time  
16 period set forth hereinabove, the Division may, at its option, rescind this Stipulation and  
17 proceed with prosecuting the Complaints before the Commission.

18 27. Respondent agrees and understands that by entering into this Stipulation,  
19 Respondent is waiving his right to a hearing at which Respondent may present evidence in his  
20 defense, his right to a written decision on the merits of the complaint, his rights to  
21 reconsideration and/or rehearing, appeal and/or judicial review, and all other rights which may  
22 be accorded by the Nevada Administrative Procedure Act, the Nevada Real Estate Brokers  
23 and Salespersons statutes and accompanying regulations, and the federal and state  
24 constitutions. Respondent understands that this Agreement and other documentation may be  
25 subject to public records laws. The Commission members who review this matter for approval  
26 of this Stipulation may be the same members who ultimately hear, consider and decide the  
27 Complaint if this Stipulation is either not approved by the Commission or is not timely  
28 performed by Respondent. Respondent fully understands that he has the right to be

1 represented by legal counsel in this matter at his own expense.

2 28. Each party shall bear its own attorney's fees and costs.

3 29. Stipulation is Not Evidence. Neither this Stipulation nor any statements made  
4 concerning this Stipulation may be discussed or introduced into evidence at any hearing on  
5 the Complaint, if the Division must ultimately present its case based on the Complaint filed in  
6 this matter.

7 30. Approval of Stipulation. Once executed, this Stipulation will be filed with the  
8 Commission and will be placed on the agenda for approval at its September 2015 public  
9 meeting. The Division will recommend to the Commission approval of the Stipulation.  
10 Respondent agrees that the Commission may approve, reject, or suggest amendments to this  
11 Stipulation that must be accepted or rejected by Respondent before any amendment is  
12 effective.

13 31. Withdrawal of Stipulation. If the Commission rejects this Stipulation or suggests  
14 amendments unacceptable to Respondent, Respondent may withdraw from this Stipulation  
15 and the Division may pursue its Complaints before the Commission at the Commission's next  
16 regular public meeting.

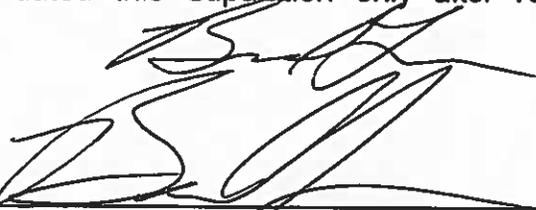
17 32. Release. In consideration of execution of this Stipulation, the Respondent for  
18 himself or herself, his or her heirs, executors, administrators, successors, and assigns, hereby  
19 release, remise, and forever discharge the State of Nevada, the Department of Business and  
20 Industry and the Division, and each of their respective members, agents, employees and  
21 counsel in their individual and representative capacities, from any and all manner of actions,  
22 causes of action, suits, debts, judgments, executions, claims, and demands whatsoever,  
23 known and unknown, in law or equity, that the Respondent ever had, now has, may have, or  
24 claim to have, against any or all of the persons or entities named in this section, arising out of  
25 or by reason of the Division's investigation, this disciplinary action, and all other matters  
26 relating thereto.

27 33. Indemnification. Respondent hereby indemnifies and holds harmless the State  
28 of Nevada, the Department of Business and Industry, the Division, and each of their

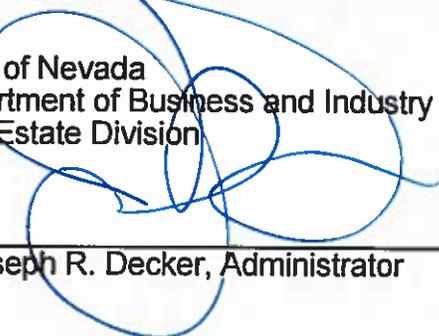
1 respective members, agents, employees and counsel in their individual and representative  
2 capacities against any and all claims, suits, and actions brought against said persons and/or  
3 entities by reason of the Division's investigation, this disciplinary action and all other matters  
4 relating thereto, and against any and all expenses, damages, and costs, including court costs  
5 and attorney fees, which may be sustained by the persons and/or entities named in this  
6 section as a result of said claims, suits, and actions.

7 34. Respondent has signed and dated this Stipulation only after reading and  
8 understanding all terms herein.

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10 Dated: 9/14/15

By:   
Bradley Lawson, Respondent

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12 Dated: 9-15-15

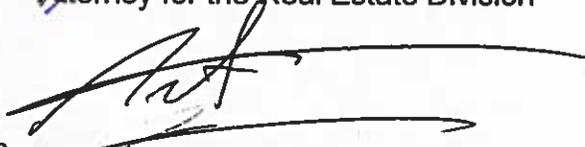
13 State of Nevada  
14 Department of Business and Industry  
15 Real Estate Division  
By:   
Joseph R. Decker, Administrator

16 Approved as to form:

17 Dated: 9-15-15

18 ADAM PAUL LAXALT  
19 Attorney General

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21 By:   
Kimberly A. Arguello  
22 Senior Deputy Attorney General  
23 Attorney for the Real Estate Division

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25 By:   
Bret Whipple  
26 Attorney for Respondent

1 **ORDER APPROVING STIPULATION**

2 The Stipulation for Settlement of Disciplinary Action having come before the Real  
3 Estate Commission, Department of Business and Industry, State of Nevada, during its regular  
4 agenda on September 15, 2015, and the Commission being fully apprised in the  
5 premises, and good cause appearing,

6 IT IS ORDERED that the above Stipulation is approved in full.

7 This Order shall become effective on the 16<sup>th</sup> day of October, 2015.

8 Dated this Sept day of September, 2015.

9 15

NEVADA REAL ESTATE COMMISSION

10  
11 By: [Signature]