

1 permitted. If the payment is not actually received by the Division on or before its due date, it shall be
2 construed as an event of default by the Respondent.

3 17. In the event of default, Respondent agrees that her license shall be immediately placed
4 in revoked status, and the unpaid balance, together with any attorney's fees and costs that may have
5 been assessed, shall be due in full to the Division within ten calendar days of the date of default.
6 Respondent agrees that the revocation status of her license shall continue until the unpaid balance is
7 paid in full. Further, debt collection actions for unpaid monetary assessments in this case may be
8 instituted by the Division.

9 18. Respondent requests that if the Commission approves this Stipulation, the Commission
10 meeting minutes report the Commission's Order Approving Stipulation as follows: "Allegedly failed
11 to maintain adequate supervision of a salesperson associated with the broker, thereby violating NRS
12 645.660(3). Respondent was not found to have violated any law or statute."

13 19. The Division agrees not to pursue any other or greater remedies or fines in connection
14 with Respondent's alleged conduct referenced herein. The Division further agrees that upon
15 Respondent's timely payment of the administrative fine that the Division will not bring any claim or
16 cause directly or indirectly any other claim to be brought by others against Respondent based upon any
17 of the facts, circumstances or allegations discovered during the Division's investigation and
18 prosecution of this Case.

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

22 21. Respondent agrees that if the administrative fine is not paid within the time period set
23 forth hereinabove, the Division may, at its option, rescind this Stipulation and proceed with prosecuting
24 the Complaint before the Commission. In that case, the Stipulation shall be null and void.

25 22. Respondent agrees and understands that by entering into this Stipulation, Respondent is
26 waiving her right to a hearing at which Respondent may present evidence in her defense, her right to a
27 written decision on the merits of the complaint, her rights to reconsideration and/or rehearing, appeal
28 and/or judicial review, and all other rights which may be accorded by the Nevada Administrative

1 Procedure Act, the Nevada Real Estate Brokers and Salespersons statutes and accompanying
2 regulations, and the federal and state constitutions. Respondent understands that this Agreement and
3 other documentation may be subject to public records laws. The Commission members who review
4 this matter for approval of this Stipulation may be the same members who ultimately hear, consider and
5 decide the Complaint if this Stipulation is either not approved by the Commission or is not timely
6 performed by Respondent. Respondent fully understands that she has the right to be represented by
7 legal counsel in this matter at her own expense.

8 23. Each party shall bear its or her own attorney's fees and costs.

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

12 25. Approval of Stipulation. Once executed, this Stipulation will be filed with the
13 Commission and will be placed on the agenda for approval at its December 2016 public meeting. The
14 Division will recommend to the Commission approval of the Stipulation. Respondent agrees that the
15 Commission may approve, reject, or suggest amendments to this Stipulation that must be accepted or
16 rejected by Respondent before any amendment is effective.

17 26. Withdrawal of Stipulation. If the Commission rejects this Stipulation or suggests
18 amendments unacceptable to Respondent, Respondent may withdraw from this Stipulation and the
19 Division may pursue its Complaint before the Commission at the Commission's next regular public
20 meeting. This Stipulation shall then become null and void, and unenforceable in any manner against
21 either party.

22 27. Release. In consideration of execution of this Stipulation, the Respondent for herself,
23 her heirs, executors, administrators, successors, and assigns, hereby release, remise, and forever
24 discharge the State of Nevada, the Department of Business and Industry and the Division, and each of
25 their respective members, agents, employees and counsel in their individual and representative
26 capacities, from any and all manner of actions, causes of action, suits, debts, judgments, executions,
27 claims, and demands whatsoever, known and unknown, in law or equity, that the Respondent ever had,
28 now has, may have, or claim to have, against any or all of the persons or entities named in this section,

1 arising out of or by reason of the Division's investigation, this disciplinary action, and all other matters
2 relating thereto.

3 28. Indemnification. Respondent hereby indemnifies and holds harmless the State of
4 Nevada, the Department of Business and Industry, the Division, and each of their respective members,
5 agents, employees and counsel in their individual and representative capacities against any and all
6 claims, suits, and actions brought against said persons and/or entities by reason of the Division's
7 investigation, this disciplinary action and all other matters relating thereto, and against any and all
8 expenses, damages, and costs, including court costs and attorney fees, which may be sustained by the
9 persons and/or entities named in this section as a result of said claims, suits, and actions.

10 29. Respondent has signed and dated this Stipulation only after reading and understanding
11 all terms herein.

12
13 Dated: DECEMBER 5, 2016 By: Vickie Valdov
14 Vickie Valdov, Respondent

15
16 Dated: DECEMBER 5, 2016 State of Nevada
17 Department of Business and Industry
18 Real Estate Division
19 By: Sharath Chandra
20 Sharath Chandra, Administrator

21
22 Approved as to form:
23 Dated: December 5, 2016
24 ADAM PAUL LAXALT
25 Attorney General
26 By: Keith E. Kizer
27 Keith E. Kizer
28 Senior Deputy Attorney General
Attorney for the Real Estate Division

Approved as to form:
Dated: DECEMBER 5, 2016
Marquis Aurbach Coffing
By: Scott A. Marquis, Esq.
Patrick C. McDonnell, Esq.
Attorneys for Respondent

ORDER APPROVING STIPULATION

The Stipulation for Settlement of Disciplinary Action having come before the Real Estate Commission, Department of Business and Industry, State of Nevada, during its regular agenda on December 5, 2016, and the Commission being fully apprised in the premises, and good cause appearing,

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

This Order shall become effective on the 22nd day of February, 2017.

Dated this 5th day of December, 2016.

NEVADA REAL ESTATE COMMISSION

By: 
Commission President