

OCT 02 2023

NEVADA COMMISSION OF APPRAISERS

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BEFORE THE COMMISSION OF APPRAISERS OF REAL ESTATE

STATE OF NEVADA

SHARATH CHANDRA, Administrator  
REAL ESTATE DIVISION, DEPARTMENT  
OF BUSINESS AND INDUSTRY, STATE  
OF NEVADA,

Case no. 2020-1080, AP21.024.S

Petitioner

ANSWER AND REQUEST FOR  
HEARING

v.

JOSHUA RYAN STALK,  
(License No. A.0207120-RES)

Respondent JOSHUA RYAN STALK, through his undersigned counsel Paul E. Larsen, Esq., of the law firm of Black & Wadhams, hereby Answers the allegations, both factual and legal, set forth in the Complaint and Notice of Hearing ("Complaint") filed herein on September 1, 2023 by Petitioner Sharath Chandra, Administrator of the Real Estate Division, Department of Business and Industry, State of Nevada ("NRED" or "Petitioner"):

1. **JURISDICTION:** Respondent does not contest the jurisdiction of NRED or the Commission of Appraisers of Real Estate, State of Nevada ("Commission").
2. **PROCEDURAL HISTORY:** Respondent admits the factual allegations set forth in Paragraphs 1 through 6 of the Complaint.
3. **FACTUAL ALLEGATIONS ADMITTED:** Respondent admits the factual allegations set forth in Paragraphs 7, 8, 9, 10, and 16 of the complaint.
4. **FACTUAL ALLEGATIONS DENIED:** Respondent disputes the conclusory factual allegations and legal conclusions set forth in paragraphs 12, 13, 14 and 15 of the Complaint, and therefore denies the same.
5. **ALLEGED VIOLATION OF USPAP RULES AND STANDARDS DENIED:** Respondent denies any alleged violations of the Standards of the Appraisal Foundation (as

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1 set forth in the 2020-2021 Uniform Standards of Professional Appraisal Practice or  
2 USPAP) in general, and specifically denies the allegations of violations in the Complaint  
3 as follows:

- 4 a. Respondent denies any violation of the USPAP Record Keeping Rule, NRS  
5 645C.405(1) and (2), or NAC 645C.405 as alleged in the Complaint's alleged  
6 "First Violation;"  
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- 8 b. Respondent denies any violation of the USPAP Competency Rule, NRS  
9 645C405(1) and (2), or NAC 645C.405 as alleged in the Complaint's alleged  
10 "Second Violation;"  
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- 12 c. Respondent denies any violation of the USPAP Rules 1-1(a) and 1-1(b), NRS  
13 645C.405(1) and (2), or NAC 645C.405 as alleged in the Complaint's alleged  
14 "Third Violation;"
- 15 d. Respondent denies any violation of the USPAP Rule 1-3(b), NRS 645C.405(1)  
16 and (2), or NAC 645C.405 as alleged in the Complaint's alleged "Fourth  
17 Violation;"
- 18 e. Respondent denies any violation of the USPAP Rule 1-4(a), NRS 645C.405(1),  
19 or NAC 645C.405 as alleged in the Complaint's alleged "Fifth Violation;"
- 20 f. Respondent denies any violation of the USPAP Rule 1-4(b), NRS 645C.470(2),  
21 or NAC 645C.405 as alleged in the Complaint's alleged "Sixth Violation;"
- 22 g. Respondent denies any violation of the USPAP Rule 1-6(a), NRS 645C.470(2),  
23 or NAC 645C.405 as alleged in the Complaint's alleged "Seventh Violation;"
- 24 h. Respondent denies any violation of the USPAP Rule 2-1(a) and 2-1(b), NRS  
25 645C.470(2), or NAC 645C.405 as alleged in the Complaint's alleged "Eighth  
26 Violation;" and  
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i. Respondent denies and disputes the allegations that factual or legal grounds for disciplinary action exist in this matter under NRS 645C.460 or NRS 622.400.

6. **DISCIPLINE:** Respondent denies and disputes the allegations that factual or legal grounds for disciplinary action exist in this matter under NRS 645C.460 or NRS 622.400.

7. **ALL OTHER ALLEGATIONS DENIED:** Respondent denies any factual or legal allegation not otherwise specifically admitted or denied in the foregoing paragraph of this Answer.

Wherefore, based upon the foregoing, Respondent invokes, retains and reserves all his legal and procedural rights under NRS Chapters 233B, NRS and NAC Chapters 645C, and other applicable law, requests a full evidentiary hearing (at such time as determined appropriate after the continuance previously granted by the Commission herein) including the Respondent's rights to appearance, representation by counsel, and presentation of witnesses and evidence in his favor and the ability to review and cross-examine witnesses and evidence presented by Petitioner; Respondent also prays that no disciplinary action be taken against the Respondent by Petitioner herein. Respondent further reserves the right to request the Commission issue subpoenas to compel witnesses to testify at any hearing herein.

Dated this 29 day of September, 2023.

**BLACK & WADHAMS**



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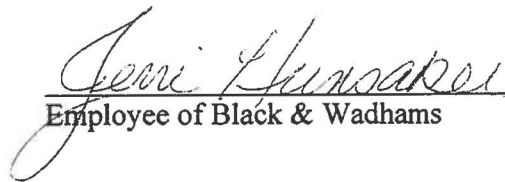
**CERTIFICATE OF SERVICE**

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I hereby certify that on the 29<sup>th</sup> day of September, 2023, I deposited a true and correct copy of the foregoing Answer and Request for Hearing in the United States mail, postage pre-paid, in Las Vegas, Nevada, addressed to the following and also *via* email at the email addresses shown below:

Phil W. Su  
Senior Deputy Attorney General  
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Las Vegas, NV 89101  
Email: [psu@ag.nv.gov](mailto:psu@ag.nv.gov)  
*Attorneys for Real Estate Division*

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Employee of Black & Wadhams