

1                   **BEFORE THE COMMISSION OF APPRAISERS OF REAL ESTATE**  
2                                   **STATE OF NEVADA**

3 SHARATH CHANDRA, Administrator,  
4 REAL ESTATE DIVISION,  
5 DEPARTMENT OF BUSINESS AND  
6 INDUSTRY,  
7 STATE OF NEVADA,

8                                   Petitioner,

9 vs.

10 BRAYDON C. CRITCHLOW,  
11 (License No. A0003929-CR),

12                                   Respondent.

Case No. 2023-449

**COMPLAINT AND NOTICE OF  
HEARING**

**FILED**

DEC 12 2025

NEVADA COMMISSION OF APPRAISERS  
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13  
14           State of Nevada, Department of Business and Industry, Real Estate Division ("the  
15 Division"), by and through counsel, Attorney General AARON D. FORD and Senior  
16 Deputy Attorney General Phil W. Su, hereby notifies BRAYDON C. CRITCHLOW  
17 ("Respondent" or "Critchlow") of an administrative complaint and hearing which is to be  
18 held pursuant to Chapter 233B and Chapter 645C of the Nevada Revised Statutes  
19 ("NRS") and Chapter 645C of the Nevada Administrative Code ("NAC"). The purpose of  
20 the hearing is to consider the allegations stated below and to determine if the Respondent  
21 should be subject to a disciplinary penalty as set forth in NRS 645C and or NAC 645C, if  
22 the stated allegations are proven at the hearing by the evidence presented.

23                                   **JURISDICTION**

24           The Respondent is a Certified Residential Appraiser licensed by the Division,  
25 License No. A.0003929-CR, and therefore is subject to the Jurisdiction of the Division and  
26 the provisions of NRS and NAC Chapter 645C. By availing himself of the benefits and  
27 protections of the laws of the State of Nevada, the Respondent has submitted to the  
28 jurisdiction of the Division.

## PROCEDURAL HISTORY

1. On June 7, 2023, the Division received a complaint from Complainant Ronald G. Coleman, a review appraiser who asserted that RESPONDENT BRAYDON C. CRITCHLOW'S appraisal report (hereinafter "Subject Appraisal Report") of the real property at 7209 Old Mission Drive, Las Vegas, NV 89128, ("the Subject Property"), used poor comparables that apparently inflated the value of the appraised property. [NRED0001-0047].

2. On August 30, 2023, the Division's investigator, James Silva, issued an open investigation letter for Case No. 2023-449, via certified mail to RESPONDENT at his address of record, concerning the Subject Appraisal Report and instructing him to provide his response and entire workfile and documentation to the Division by September 15, 2023. [NRED0048-0050].

3. In a letter dated "09/23," RESPONDENT provided a five-page response letter to the Division, criticizing Complainant Coleman's One-Unit Residential Appraisal Field Review Report, and providing his workfile. [NRED0051-0055; 0056-0062; 0063-0138].

4. On February 13, 2025, the Division commissioned a Standard 3 Review of RESPONDENT'S Appraisal Report, which was completed by reviewer Grace Lombardo on March 27, 2025. [NRED0140-0142; NRED0143-0201].

5. On August 1, 2025, Investigator Silva completed his investigation and issued his case findings, recommending this matter be referred to the Commission via formal complaint. [NRED0202-0212].

6. Among the reasons cited by Investigator Silva for referral to Commission were the "numerous possible USPAP violations" and RESPONDENT'S "numerous prior" disciplinary actions including cases that resulted in one formal hearing in 2006, two hearings in 2007, and three hearings in 2009. [NRED0212]

7. On August 5, 2025, Investigator Silva sent RESPONDENT an NRS 233B letter, via certified mail, indicating that the Division has obtained sufficient information

1 to commence disciplinary action against him and intended to do so by filing a formal  
2 complaint with the Commission of Appraisers of Real Estate. [NRED0202-0203].

### 3 **FACTUAL ALLEGATIONS**

4 8. At all times relevant, RESPONDENT has been an active Nevada Certified  
5 Residential Appraiser, License No. A.0003929-CR.

6 9. The RESPONDENT'S Appraisal Report was prepared on a Fannie Mae 1004  
7 form for a single-family residence located at 7209 Old Mission Drive, Las Vegas, NV  
8 89128, APN 138-22-710-033 ("the Subject Property"). [NRED0004-0046].

9 10. On February 9, 2023, RESPONDENT signed the Appraisal Report accepting  
10 full responsibility for the contents of the Report, including his analysis, opinions,  
11 statements, conclusions, and certification. [NRED0009-0010].

12 11. Although the Appraisal Report provided two adjustments to the sales grid  
13 (i.e. \$35/sq. ft. for Gross Living Area ("GLA"); \$2,000 for fireplace), there was no data in  
14 the Appraisal Report, such as a paired sales analysis, to indicate how such adjustments  
15 were extracted from the market or otherwise determined. [NRED0143; 0149; 0065].

16 12. The Appraisal Report failed to properly and accurately identify and report  
17 details material to the appraisal, ranging from comp conditions (e.g. characterizing comp  
18 1, which had recently been remodeled, as a C4 condition rather than a C3 category  
19 property), and prior sales of the property within the last three years (including on  
20 3/4/2020 for \$154,791), to the listing history of the property, which list price was lowered  
21 from \$349,000 on 11/29/22 to \$340,000 as of 3/8/23, per MLS. [NRED00162; 0070; 0005;  
22 0110-0111; 0195].

23 13. The limited information in the 1004MC indicated declining comparable  
24 prices, but the Appraisal Report inconsistently noted price trends as "stable" in both the  
25 1004MC trend and on page one of the Appraisal Report. [NRED0143; 0149-0150; 0005;  
26 0024-0025].

27 14. RESPONDENT did not opt to use recent model match comps (1720 Villa  
28 Vista Way and 1712 Sierra Hills Way) located in the subject subdivision that sold for

1 lower prices than the comps used in the Appraisal Report and instead used comps outside  
2 of the subject subdivision that sold for higher prices. [NRED0143; 0152; 0137].

3 15. Comp characteristics in the Appraisal Report were not analyzed and the  
4 subject characteristics were not bracketed in the sales grid, contrary to Fannie Mae and  
5 FHA guidelines, despite all comps in the Appraisal Report having larger GLA than the  
6 subject property. [NRED0143; 0154].

7 16. The Appraisal Report provided no data, information, or documentation in a  
8 work file, or summary in the original appraisal report, indicating how lot value, dwelling  
9 costs, and/or land value were determined in the cost approach, despite it being considered  
10 part of the Scope of Work of the assignment. [NRED0144; 0157; 0007; 0079].

### 11 **VIOLATIONS OF LAW**

12 RESPONDENT failed to prepare the Subject Appraisal Report for the Subject  
13 Property in Compliance with the Standards of the Appraisal Foundation and the law. The  
14 Standards are published in the Uniform Standards of Professional Appraisal Practice  
15 ("USPAP") adopted by the Appraisal Standards Board of the Appraisal Foundation, as  
16 authorized by Congress, and adopted in Nevada by NAC 645C.400(1).

#### 17 **First Violation**

18 RESPONDENT violated USPAP ETHICS RULE by stating a scope of work that  
19 was not actually performed (i.e. not supported in the workfile) when there was no  
20 evidence such work was performed since the work file is unsupported.

21 Further, RESPONDENT violated the Ethics Rule pursuant to violations of the  
22 Record Keeping Rule by failing to include paired sales analysis in the work file.

23 RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
24 645C.470(2), as determined by NAC 645C.405(1) and grounds for disciplinary action  
25 pursuant to NRS 645C.460(1)(a) and/or (b).

#### 26 **Second Violation**

27 RESPONDENT violated USPAP RECORD KEEPING RULE by failing to  
28 sufficiently support the appraisal report, or work file, with data including the

1 adjustments extracted from the market.

2 Further, RESPONDENT violated the Record Keeping Rule by failing to justify his  
3 conclusion of stable price trends in light of the 1004MC data indicating declining prices.

4 Further, RESPONDENT failed to sufficiently support the report, or work file, with  
5 data, information, or documentation to support land value, dwelling costs, and/or  
6 depreciation in the Cost Approach.

7 RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
8 645C.470(2), as determined by NAC 645C.405(1) and grounds for disciplinary action  
9 pursuant to NRS 645C.460(1)(a) and/or (b).

### 10 **Third Violation**

11 RESPONDENT violated USPAP COMPETENCY RULE by rendering his appraisal  
12 services in a careless and/or negligent manner, without due diligence and/or due care; by  
13 failing to provide data in the report or workfile to demonstrate report's adjustments were  
14 extracted from the market (i.e. no paired sales analysis), or otherwise based on market  
15 data; by failing to calculate market conditions based on reliable sources; by failing to use  
16 truly comparable sales data (e.g. relying upon comparables outside of subject property's  
17 market area/master plan); and/or by failing to provide data to support land value.

18 RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
19 645C.470(2), as determined by NAC 645C.405(1) and grounds for disciplinary action  
20 pursuant to NRS 645C.460(1)(a) and/or (b).

### 21 **Fourth Violation**

22 RESPONDENT violated USPAP SCOPE OF WORK RULE by failing to include the  
23 research and analyses necessary to develop credible assignment results, as demonstrated  
24 by the lack of data in the appraisal report, or work file, indicating the adjustments were  
25 extracted from market data.

26 Further, RESPONDENT failed to account for market conditions in the sales grid;  
27 provided an incomplete 1004MC grid; failed to use more applicable, available comps; and  
28 failed to complete his cost approach analysis by providing data to support land value and

1 dwelling costs set forth in that section.

2       RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
3 645C.470(2), as determined by NAC 645C.405(1) and grounds for disciplinary action  
4 pursuant to NRS 645C.460(1)(a) and/or (b).

5                               **Fifth Violation**

6       RESPONDENT violated USPAP Standards Rule 1-1(a) by failing to provide data in  
7 the report or workfile to demonstrate report's adjustments were extracted from the  
8 market (i.e. no paired sales analysis) or otherwise based on market data; and/or by failing  
9 to use more applicable, available comps and sales data.

10       RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
11 645C.470(2), as determined by NAC 645C.405(1) and (2) and grounds for disciplinary  
12 action pursuant to NRS 645C.460(1)(a) and/or (b).

13                               **Sixth Violation**

14       RESPONDENT violated USPAP Standards Rule 1-1(b) by omitting two  
15 comparables within the subject subdivision, including a model match comp.

16       RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
17 645C.470(2), as determined by NAC 645C.405(1) and (2) and grounds for disciplinary  
18 action pursuant to NRS 645C.460(1)(a) and/or (b).

19                               **Seventh Violation**

20       RESPONDENT violated USPAP Standards Rule 1-1(c) by rendering his services in  
21 a careless and/or negligent manner by committing a series of errors that, although  
22 individually might not significantly affect the results of an appraisal, in the aggregate  
23 affects the credibility of those results, including, but not limited to: providing inconsistent  
24 and conflicting verbiage regarding REO information and housing demand/supply, and by  
25 repeatedly referring to the obsolete term "Complete Appraisal" rather than the current  
26 report options of "Restricted Appraisal Report" and "Appraisal Report."

27       RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
28 645C.470(2), as determined by NAC 645C.405(1) and (2) and grounds for disciplinary



1 action pursuant to NRS 645C.460(1)(a) and/or (b).

2 **Eighth Violation**

3 RESPONDENT violated USPAP Standards Rule 1-2(h) by failing to include the  
4 data in the appraisal report, or work file, indicating the adjustments were extracted from  
5 market data.

6 RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
7 645C.470(2), as determined by NAC 645C.405(1) and grounds for disciplinary action  
8 pursuant to NRS 645C.460(1)(a) and/or (b).

9 **Ninth Violation**

10 RESPONDENT violated USPAP Standards Rule 1-4(a) by failing to provide data in  
11 the report or workfile to demonstrate report's adjustments were extracted from the  
12 market (i.e. no paired sales analysis) or otherwise based on market data; and/or by failing  
13 to calculate market conditions based on reliable sources.

14 RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
15 645C.470(2), as determined by NAC 645C.405(1) and grounds for disciplinary action  
16 pursuant to NRS 645C.460(1)(a) and/or (b).

17 **Tenth Violation**

18 RESPONDENT violated USPAP Standards Rule 1-5(a) by failing to properly  
19 indicate the property's listing history or to provide an explanation for the discrepancy.

20 RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
21 645C.470(2), as determined by NAC 645C.405(1) and (2) and grounds for disciplinary  
22 action pursuant to NRS 645C.460(1)(a) and/or (b).

23 **Eleventh Violation**

24 RESPONDENT violated USPAP Standards Rule 1-5(b) by failing to properly  
25 analyze all sales of the property that occurred within the past three years, specifically the  
26 sale of the property on 3/4/20 for \$154,791, an analysis required by Fannie Mae.

27 RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
28 645C.470(2), as determined by NAC 645C.405(1) and (2) and grounds for disciplinary

1 action pursuant to NRS 645C.460(1)(a) and/or (b).

2 **Twelfth Violation**

3 RESPONDENT violated USPAP Standards Rule 2-1(a) by stating a scope of work  
4 that was not actually performed (i.e. not supported in the workfile) regarding adjustments  
5 and support for land value in the Cost Approach section of the Appraisal Report.

6 RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
7 645C.470(2), as determined by NAC 645C.405(1) and (2) and grounds for disciplinary  
8 action pursuant to NRS 645C.460(1)(a) and/or (b).

9 **Thirteenth Violation**

10 RESPONDENT violated USPAP Standards Rule 2-1(b) by failing to provide data in  
11 the report or workfile to demonstrate report's adjustments were extracted from the  
12 market (i.e. no paired sales analysis) or otherwise based on market data; and/or by failing  
13 to calculate market conditions based on reliable sources.

14 RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
15 645C.470(2), as determined by NAC 645C.405(1) and (2) and grounds for disciplinary  
16 action pursuant to NRS 645C.460(1)(a) and/or (b).

17 **Fourteenth Violation**

18 RESPONDENT violated USPAP Standards Rule 2-2(a)(viii) by failing to provide  
19 data in the report or workfile to demonstrate report's adjustments were extracted from  
20 the market (i.e. no paired sales analysis), or otherwise based on market data; by failing to  
21 calculate market conditions based on reliable sources; by failing to use truly comparable  
22 sales data (e.g. relying upon comparables outside of subject property's market  
23 area/master plan); and/or by failing to provide data to support land value.

24 **Fifteenth Violation**

25 RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
26 645C.470(2), as determined by NAC 645C.405(1) and grounds for disciplinary action  
27 pursuant to NRS 645C.460(1)(a) and/or (b).

28 RESPONDENT violated USPAP Standards Rule 2-2(a)(x), specifically Items (1)



1 and (5) for failing to summarize appraisal methods and summarize information analyzed  
2 with support, as committed by the lack of explanation and support for adjustments,  
3 including lack of market condition adjustments.

4 RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
5 645C.470(2), as determined by NAC 645C.405(1) and grounds for disciplinary action  
6 pursuant to NRS 645C.460(1)(a) and/or (b).

#### 7 **Sixteenth Violation**

8 RESPONDENT violated USPAP Standards Rule 2-2(a)(xiv) by failing to provide  
9 the necessary signed certifications within the appraisal report pursuant to USPAP, pp.  
10 23-24, lines 694-719 for all required line items.

11 RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
12 645C.470(2), as determined by NAC 645C.405(1) and grounds for disciplinary action  
13 pursuant to NRS 645C.460(1)(a) and/or (b).

#### 14 **Seventeenth Violation**

15 RESPONDENT violated USPAP Standards Rule 2-3(a) by failing to provide the  
16 necessary signed certifications within the appraisal report pursuant to USPAP, pp. 23-24,  
17 lines 694-719 for all required line items.

18 RESPONDENT'S actions constitute unprofessional conduct pursuant to NRS  
19 645C.470(2), as determined by NAC 645C.405(1) and grounds for disciplinary action  
20 pursuant to NRS 645C.460(1)(a) and/or (b).

#### 21 **DISCIPLINE AUTHORIZED**

22 1. Pursuant to NRS 645C.460(2), if grounds for disciplinary action against an  
23 appraiser are found to exist for unprofessional conduct, the Commission may revoke or  
24 suspend the certificate, place conditions upon the certificate, deny the renewal of his or  
25 her certificate, and/or impose a fine up to \$10,000.00 per violation.

26 2. Additionally, under NRS 622.400, the Commission is authorized to impose  
27 the costs of the proceeding upon the Respondent, including investigative costs and  
28 attorney's fees, if the Commission otherwise imposes discipline on the Respondent.

1           3.       Therefore, the Division requests the Commission to impose such discipline as  
2 it determines is appropriate under the circumstances and to award the Division its costs  
3 and attorney's fees for this proceeding.

4           **PLEASE TAKE NOTICE** that a disciplinary hearing has been set to consider this  
5 Administrative Complaint against the above-named Respondent in accordance with  
6 Chapter 233B and Chapter 645C of the Nevada Revised Statutes and Chapter 645C of the  
7 Nevada Administrative Code.

8           **THE HEARING WILL TAKE PLACE** at the Commission meeting scheduled  
9 for January 13-15, 2026, beginning at approximately 9:00 a.m. each day, or until  
10 such time as the Commission concludes its business. The Commission meeting  
11 will be held at the Nevada State Business Center, 3300 W. Sahara Avenue,  
12 Nevada Room 4<sup>th</sup> Floor, Las Vegas, Nevada 89102, with video conference to:  
13 Department of Business & Industry, 1818 College Parkway, Suite 103, Carson  
14 City, Nevada 89706.

15           **STACKED CALENDAR:** Your hearing is one of several hearings that may  
16 be scheduled at the same time as part of a regular meeting of the Commission  
17 that is expected to take place on January 13-15, 2026. Thus, your hearing may  
18 be continued until later in the day or from day to day. It is your responsibility  
19 to be present when your case is called. If you are not present when your case is  
20 called, a default may be entered against you, and the Commission may decide  
21 the case as if all allegations in the complaint were true. If you need to negotiate  
22 a more specific time for your hearing in advance, because of coordination with  
23 out-of-state witnesses or the like, please call Maria Gallo, Commission  
24 Coordinator, at (702) 486-4074.

25           **YOUR RIGHTS AT THE HEARING:** Except as mentioned below, the hearing is an  
26 open meeting under Nevada's Open Meeting Law (OML) and may be attended by the  
27 public. After the evidence and arguments, the Commission may conduct a closed meeting  
28 to discuss your alleged misconduct or professional competence. You are entitled to a copy

1 of the transcript of the open and closed portions of the meeting, although you must pay for  
2 the transcription.

3 As the Respondent, you are specifically informed that you have the right to appear  
4 and be heard in your defense, either personally or through your counsel of choice. At the  
5 hearing, the Division has the burden of proving the allegations in the complaint and will  
6 call witnesses and present evidence against you. You have the right to respond and to  
7 present relevant evidence and argument on all issues involved. You have the right to call  
8 and examine witnesses, introduce exhibits, and cross-examine opposing witnesses on any  
9 matter relevant to the issues involved.


10 You have the right to request that the Commission issue subpoenas to compel  
11 witnesses to testify and/or evidence to be offered on your behalf. In making this request,  
12 you may be required to demonstrate the relevance of the witnesses' testimony and/or  
13 evidence. Other important rights you have are listed in NRS Chapter 645C, NRS  
14 Chapter 233B, and NAC Chapter 645C.

15 DATED the 12 day of December, 2025.

DATED the 12th day of December, 2025.

16  
17 NEVADA REAL ESTATE DIVISION

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