

**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. 2023-449

Petitioner,
vs.

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

Respondent.

**COMPLAINT AND NOTICE OF
HEARING**

FILED

DEC 12 2025

NEVADA COMMISSION OF APPRAISERS
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State of Nevada, Department of Business and Industry, Real Estate Division ("the Division"), by and through counsel, Attorney General AARON D. FORD and Senior Deputy Attorney General Phil W. Su, hereby notifies BRAYDON C. CRITCHLOW ("Respondent" or "Critchlow") of an administrative complaint and hearing which is to be held pursuant to Chapter 233B and Chapter 645C of the Nevada Revised Statutes ("NRS") and Chapter 645C 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 a disciplinary penalty as set forth in NRS 645C and or NAC 645C, if the stated allegations are proven at the hearing by the evidence presented.

JURISDICTION

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

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

Eighth Violation

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

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

Ninth Violation

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

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

Tenth Violation

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

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

Eleventh Violation

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

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

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

Twelfth Violation

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

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

Thirteenth Violation

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

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

Fourteenth Violation

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

Fifteenth Violation

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

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 4th 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 NEVADA REAL ESTATE DIVISION

17 
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