

1 REAL ESTATE DIVISION,
2 DEPARTMENT OF BUSINESS AND INDUSTRY,
3 STATE OF NEVADA

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

9 Petitioner,

10 vs.

11 CHUKWUNEIKE E. UDOM
12 A.0007374-CR

13 Respondent.

) STIPULATION FOR SETTLEMENT
) OF DISCIPLINARY ACTION
) PURSUANT TO NAC 645C.610 (3)

) Case No. 2020-188, AP20.032.S
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14 STIPULATION FOR SETTLEMENT OF DISCIPLINARY
15 ACTION PURSUANT TO NAC 645C.610 (3)

16 1. PARTIES. This Stipulation is entered into by and between the Petitioner, the REAL
17 ESTATE DIVISION, DEPARTMENT OF BUSINESS AND INDUSTRY, STATE OF NEVADA (the "Division"),
18 by and through its Administrator, SHARATH CHANDRA (the "Administrator"), and the Respondent,
19 CHUKWUNWEIKE E. UDOM(whether one or more hereinafter the "Respondent"), who at relevant
20 time was licensed by the State of Nevada, license number(s) A.00007374-CR. This Stipulation is
21 entered into upon mutual agreement with the decision of the Appraisal Advisory Review
22 Committee (the "AARC"), which was reached at its informal conference held on August 17, 2021,
23 virtually via Webex. Members of the AARC present were William Kimmel, Chairperson, Wendell
24 Snow and Derek Stoddard .

25 2. AUTHORITY OF THE APPRAISAL ADVISORY REVIEW COMMITTEE. The Appraisal
26 Advisory Review Committee has authority to enter into this Stipulation with the Respondent
27 pursuant to NAC 645C.610 (3).

28 3. FINDINGS. The AARC has found that the Respondent, while licensed, certified or
registered as a Nevada Appraiser, committed violations of chapter 645C of Nevada Revised Statutes

1 and Nevada Administrative Code and/or USPAP. A description of the conduct in which these
2 violations were committed is set forth in specificity in the Summary of Facts which is attached
3 hereto as EXHIBIT "A". The Administrator has the authority, pursuant to NAC 645C.600 (2), to
4 establish an advisory committee in an attempt to review this matter informally and recommend a
5 resolution.

6 **4. NO ADMISSION OF GUILT.** The Respondent does not admit or deny the findings of
7 the AARC, choosing to remain silent, but does agree that the findings establish a prima facie case
8 for the discipline set forth below and stipulates, subject to the limitations and conditions set forth
9 below, that the Division shall not be required to provide further evidence of such allegations.

10 **5. SETTLEMENT FOR DISCIPLINARY ACTION.** As set forth above, the AARC is
11 authorized under NAC 645C.610 to impose an administrative fine, upon final approval by the
12 Commission. The Division also has the option to file a complaint with the Nevada Commission of
13 Appraisers of Real Estate (the "Commission"). The Commission has the authority pursuant to NRS
14 645C.460(2)(d) to impose a fine of up to \$10,000 for each violation alleged or to suspend or revoke
15 the Respondent's certificate, license or registration card. The parties, however, desire to
16 compromise and settle the instant controversy, without a hearing, upon the following terms and
17 conditions:

18 **AARC Committee Recommendations**

19 **Not less than a 4-hour course in Appraiser Self Protection-Documentation and
20 Record Keeping**

21 **Not less than a 4-hour course in Residential Adjustments Course**

22 **Not less than a 15-hour course in Residential Market Analysis and Highest and
23 Best Use.**

24 **For a total of not less than 23 hours of continued education, to be completed within 1 year of the
25 Appraisal Commission President signing the stipulated agreement. None of the above listed
26 continued education will count towards license renewal.**

27 **Once the recommended education is completed, and within 1 year, the respondent will submit 1-
28 months of Appraisal Logs to the Real Estate Division, the Division will select random appraisals
for review for USPAP compliance, for a one-time review, unless issues are found with the
reviewed appraisals.**

1 **b. Public Record.** RESPONDENT and the DIVISION agree that by entering into this
2 Stipulation, the DIVISION does not concede any defense or mitigation RESPONDENT may assert,
3 and the parties agree that the DIVISION will not publicize the instant disciplinary matter, except as
4 set forth below, and that once this Stipulation is approved and fully performed, the DIVISION will
5 close its file in this matter. RESPONDENT understands that the public records law may require the
6 DIVISION to make available for inspection this Stipulation and related documents. RESPONDENT
7 also understands that the DIVISION may share the content of this Stipulation and related
8 documents with any governmental or professional organization or member of the public;

9 **c. Newsletter.** RESPONDENT and the DIVISION agree that the DIVISION, at its
10 discretion, may publish in the newsletter an anonymous summary of the alleged offenses of
11 RESPONDENT and the terms of this Stipulation, with the understanding of all parties that such
12 publication will not specifically name RESPONDENT or make reference to any other party;
13 RESPONDENT will be referred to only as a licensee in the State of Nevada. It is further understood
14 by the parties that this publication is for educational purposes only and to advise other licensees
15 of the alleged violation(s) and that disciplinary action has been taken by the DIVISION;

16 **d. Failure to perform; hearing on complaint.**
17 RESPONDENT agrees that if the required education is not completed in the time allowed above,
18 RESPONDENT'S license will be automatically suspended until such time as the fine is paid and
19 continuing education requirement satisfied. The DIVISION may, at its option, rescind this
20 Stipulation and proceed with filing a Complaint before the Commission. Further, recovery actions
21 for the administrative fines may be instituted by the DIVISION;

22 **e. No other remedies.** Assuming Respondent complies with the terms of this
23 stipulation, the Division agrees not to pursue any other or greater remedies or fines in connection
24 with the conduct referenced in above unless stipulation is rescinded.

25 **f. Waiver by Respondent.** RESPONDENT agrees and understands that by entering
26 into this Stipulation, RESPONDENT is waiving his/her right to a hearing at which RESPONDENT may
27 present evidence in his/her defense and to be represented by counsel, to judicial review of any
28 adverse decision by the Commission, and to present his/her defense to a Commission which has
had no prior familiarity with the instant matter. The Commission members who review this
matter for approval of this Stipulation may be the same members who ultimately hear the

DIVISION'S complaint if this Stipulation is either not approved by the Commission or is not timely performed by RESPONDENT; and

g. **Attorney fees and other costs.** Each party shall bear its own attorney's fees and other costs not specifically set forth in this Stipulation.

6. **RELEASE.** In consideration of execution of this Stipulation, the Respondent for himself/herself or his/her heirs, executors, administrators, successors, and assigns, hereby release, remiss, and forever discharge the State of Nevada, the Department of Business and Industry of the State of Nevada, the Division, and each of their members, agents, and employees in their individual and representative capacities, from any and all manner of actions, causes of action, suits, debts, judgments, executions, claims, and demands whatsoever, known and unknown, in law or equity, that the Respondents ever had, now has, may have, or claims to have against any or all of the persons or entities named in this section, arising out of or by reason of the Division's investigation, this disciplinary action, or any other matter relating thereto.

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

8. **COMMISSION APPROVAL OF STIPULATION NECESSARY.** Once executed, this Stipulation will be filed with the Commission and will be put on the agenda for approval at its meeting, which by Nevada law is a public meeting. At that time, the DIVISION will recommend to the Commission approval of the Stipulation. RESPONDENT acknowledges and agrees that the Commission may approve this Stipulation, reject it, or suggest different terms which must be communicated to RESPONDENT and accepted or rejected by RESPONDENT before any such amendment shall become effective.

9. **SETTLEMENT DISCUSSIONS NOT EVIDENCE.** Any statements made during the discussions leading up to this Stipulation may not be discussed or introduced into evidence at any hearing. However, evidence of the Respondent's failure to abide by the terms of any Stipulation

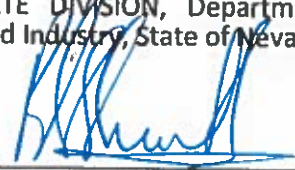
entered into with the Division, may be introduced at a hearing and used against the Respondent.

10. STIPULATION IS NOT A BAR TO FUTURE PROCEEDINGS. This Stipulation shall not constitute an estoppel, merger or bar to any administrative or civil proceeding by the Division with respect to any future matters or other matters that were not consideration for this Stipulation.


SO STIPULATED.

Dated: 03/17/2022

REAL ESTATE DIVISION, Department of Business and Industry, State of Nevada

By: 
Sharath Chandra
Administrator

Dated: 1/30/22


Respondent

ORDER

The foregoing Stipulation was approved by a vote of the Nevada Commission of Appraisers of Real Estate on.

DATED this _____ day of _____, 2021.

NEVADA COMMISSION OF APPRAISERS OF REAL ESTATE

Appraisal Commission President

CERTIFICATE OF SERVICE

I, hereby certify that I am an employee of the Real Estate Division, Department of Business and Industry, State of Nevada and that on the 4th day of August 2021, I served a fully executed copy of the foregoing **STIPULATION FOR SETTLEMENT OF DISCIPLINARY ACTION PURSUANT TO NAC 645C.610 (3)** by depositing a copy of the same in the State of Nevada mailroom, properly addressed, certified return receipt requested, addressed as follows:

Name: CHUKWUNWEIKE E. UDOM
PLATINUM APPRAISAL SERVICES
7432 REDHEAD DRIVE
NORTH LAS VEGAS, NEVADA 89084

CERTIFIED MAIL # 7015 1660 0000 0167 3382

Jaye Lindsay, Appraisal Program Manager