

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 DAVID ALAN PERKINS,
11 (License No. A.0206151-CR),

12 Respondent.

Case No. 2024-1021

**COMPLAINT AND NOTICE OF
HEARING**

FILED

DEC 19 2024

NEVADA COMMISSION OF APPRAISERS
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13 The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND
14 INDUSTRY OF THE STATE OF NEVADA (“the Division”), by and through counsel,
15 Attorney General Aaron D. Ford and Senior Deputy Attorney General Phil W. Su, hereby
16 notifies Respondent DAVID ALAN PERKINS (“RESPONDENT”) of an administrative
17 complaint and hearing which is to be held pursuant to Chapter 233B and Chapter 645C of
18 the Nevada Revised Statutes (“NRS”) and Chapter 645C of the Nevada Administrative
19 Code (“NAC”). The purpose of the hearing is to consider the allegations stated below and
20 to determine if the Respondent should be subject to a disciplinary penalty as set forth in
21 NRS 645C and or NAC 645C, if the stated allegations are proven at the hearing by the
22 evidence presented.

23 **JURISDICTION**

24 RESPONDENT is a Certified Residential Appraiser licensed by the Division,
25 License No. A.0206151-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.

1 **FACTUAL ALLEGATIONS**

2 1. On October 22, 2024, as part of an appraisal license renewal from
3 Respondent DAVID ALAN PERKINS, the Nevada Real Estate Division (“Division” or
4 “NRED”) received a self-reported copy of a July 3, 2023, stipulated disciplinary agreement
5 between RESPONDENT and the Bureau of Real Estate Appraisers of California. (“BREA
6 Disciplinary Order”) [NRED 0001-0014].

7 2. The BREA Disciplinary Order states “IT IS HEREBY ORDERED that
8 Respondent's Real Estate Appraisers License No. 031262 is revoked. However, the
9 revocation of Respondent's License shall be stayed, and Respondent's License shall be
10 publicly reprovved. Respondent's License shall be restricted and monitored on probation
11 for two (2) years from the effective date of the Decision and Order on the terms and
12 conditions described below. If Respondent fails to comply with the terms and conditions of
13 probation, as set forth below, the Bureau may revoke Respondent's License.” [NRED
14 0008.]

15 3. The BREA Disciplinary Order further ordered, under the section entitled
16 “Restricted License – Supervision,” that “Respondent shall not supervise any individual
17 in the practice of real estate appraisal for the entire term of probation from the effective
18 date of the Decision and Order.” [NRED 0008].

19 4. On or about December 5, 2024, the Division’s investigator, James Silva,
20 recommended this matter be forwarded to the Commission for consideration of reciprocal
21 discipline. [NRED 0015-0017].

22 **VIOLATIONS OF LAW**

23 1. RESPONDENT violated NRS 645C.460(1)(e) when he stipulated to subject
24 himself to revocation (subsequently stayed) in another jurisdiction, the State of
25 California, pursuant to the July 3, 2023, BREA Disciplinary Order.

26 **DISCIPLINE AUTHORIZED**

27 1. Pursuant to NRS 645C.460(2), if grounds for disciplinary action against an
28 appraiser are found to exist for unprofessional conduct, the Commission may revoke or

1 suspend the certificate, place conditions upon the certificate, deny the renewal of his or
2 her certificate, and/or impose a fine up to \$10,000.00 per violation.

3 2. Additionally, under NRS 622.400, the Commission is authorized to impose
4 the costs of the proceeding upon the RESPONDENT, including investigative costs and
5 attorney's fees, if the Commission otherwise imposes discipline on the RESPONDENT.

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

9 **PLEASE TAKE NOTICE** that a disciplinary hearing has been set to consider this
10 Administrative Complaint against the above-named RESPONDENT in accordance with
11 Chapter 233B and Chapter 645C of the Nevada Revised Statutes and Chapter 645C of the
12 Nevada Administrative Code.

13 **THE HEARING WILL TAKE PLACE** at the Commission meeting scheduled
14 for January 21-23, 2025, beginning at approximately 9:00 a.m. each day, or until
15 such time as the Commission concludes its business. The Commission meeting
16 will be held at the Nevada State Business Center, 3300 W. Sahara Avenue,
17 Nevada Room 4th Floor, Las Vegas, Nevada 89102, with video conference to:
18 Department of Business & Industry, 1818 E. College Parkway, Suite 103, Carson
19 City, Nevada 89076.

20 **STACKED CALENDAR:** Your hearing is one of several hearings that may
21 be scheduled at the same time as part of a regular meeting of the Commission
22 that is expected to take place on January 21-23, 2025. Thus, your hearing may
23 be continued until later in the day or from day to day. It is your responsibility
24 to be present when your case is called. If you are not present when your case is
25 called, a default may be entered against you, and the Commission may decide
26 the case as if all allegations in the complaint were true. If you need to negotiate
27 a more specific time for your hearing in advance, because of coordination with
28 out-of-state witnesses or the like, please call Maria Gallo, Commission

1 **Coordinator, at (702) 486-4074.**

2 YOUR RIGHTS AT THE HEARING: Except as mentioned below, the hearing is an
3 open meeting under Nevada's Open Meeting Law (OML) and may be attended by the
4 public. After the evidence and arguments, the Commission may conduct a closed meeting
5 to discuss your alleged misconduct or professional competence. You are entitled to a copy
6 of the transcript of the open and closed portions of the meeting, although you must pay for
7 the transcription.

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

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

DATED the 18 day of December, 2024.

DATED the ____ day of December, 2024.

NEVADA REAL ESTATE DIVISION

AARON D. FORD
Attorney General

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