

FILED

APR 10 2026

NEVADA COMMISSION OF APPRAISERS

M. Gallo

1 TAYLOR SIMPSON, ESQ.
Nevada Bar No. 13956
2 **KERR SIMPSON ATTORNEYS AT LAW**
2900 W. Horizon Ridge Parkway, Suite 200
3 Henderson, Nevada 89052
4 Telephone No. (702) 451-2055
5 Facsimile No. (702) 451-2077
taylor@kerrsimpsonlaw.com
6 *Attorneys for Respondent*

7 **BEFORE THE COMMISSION OF APPRAISERS OF REAL ESTATE**
8 **STATE OF NEVADA**

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

Case No.: 2023-449

11 Petitioner,

12 vs.

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

14 Respondent.
15

16 **RESPONDENT'S ANSWER TO COMPLAINT AND NOTICE OF HEARING**

17 Respondent BRAYDON C. CRITCHLOW, by and through his attorney of record,
18 TAYLOR SIMPSON, ESQ. of KERR SIMPSON ATTORNEYS AT LAW hereby answers
19 Petitioners SHARATH CHANDRA, Administrator, and REAL ESTATE DIVISION,
20 DEPARTMENT OF BUSINESS AND INDUSTRY, STATE OF NEVADA's Complaint, as
21 follows:
22

23 **JURISDICTION**

24 Admits.

25 **PROCEDURAL HISTORY**

26 1. Respondent admits that on or about June 7, 2023, the Division received a complaint
27 from Ronald G. Coleman concerning Respondent's appraisal report of the identified property.
28

KERR SIMPSON ATTORNEYS AT LAW
2900 W. Horizon Ridge Parkway, Suite 200, Henderson, Nevada 89052
Telephone: (702) 451-2055 Facsimile: (702) 451-2077

1 Respondent denies the allegations and characterizations contained in the complaint, including any
2 assertion that the appraisal used poor comparables or inflated the value of the property.

3 2. Respondent admits that on or about August 30, 2023, the Division's investigator
4 issued an investigation letter concerning the Subject Appraisal Report requesting a response and
5 work file. Respondent denies any implication that issuance of such letter establishes wrongdoing.

6 3. Respondent admits that he provided a written response to the Division and
7 produced his work file. Respondent denies any allegation or characterization of the substance or
8 accuracy of any assertions regarding the content of that response beyond the fact that it was
9 submitted.

10 4. Respondent admits that the Division commissioned a Standard 3 Review of the
11 appraisal report and that such review was completed as alleged. Respondent denies that the review
12 establishes violations of USPAP or any misconduct.

13 5. Respondent admits that Investigator Silva completed his investigation and issued
14 findings recommending referral of the matter to the Commission. Respondent denies that such
15 findings establish violations of law or professional standards.

16 6. Respondent admits that Investigator Silva cited alleged reasons for referral as
17 described. Respondent denies the allegations of "numerous possible USPAP violations" and denies
18 any implication that prior disciplinary matters establish wrongdoing in this case.

19 7. Respondent admits that on or about August 5, 2025, Investigator Silva sent
20 correspondence pursuant to NRS 233B indicating the Division's intent to file a formal complaint.
21 Respondent denies that the Division has proven any violation of law or professional standards.

22
23
24
25 **FACTUAL ALLEGATIONS**

26 8. Respondent admits that at all times relevant he was an active Nevada Certified
27 Residential Appraiser licensed under License No. A.0003929-CR.
28

- 1 Tenth Violation: Denies.
- 2 Eleventh Violation: Denies.
- 3 Twelfth Violation: Denies.
- 4 Thirteenth Violation: Denies.
- 5 Fourteenth Violation: Denies.
- 6 Fifteenth Violation: Denies.
- 7 Sixteenth Violation: Denies.
- 8 Seventeenth Violation: Denies.
- 9 Respondent further denies that he engaged in unprofessional conduct or that grounds exist
- 10 for disciplinary action under NRS 645C.460, NRS 645C.470, or NAC 645C.405.

11 **DISCIPLINE AUTHORIZED**

12 Respondent admits that the cited statutes and regulations set forth the Commission's
13 general authority and procedures. Respondent denies that grounds exist for the imposition of any
14 discipline, fines, costs, or attorney's fees in this matter. To the extent this section contains legal
15 conclusions, requests for relief, or procedural notices, no response is required.

16 **AFFIRMATIVE DEFENSES**

17 Without assuming any burden of proof that would otherwise rest with the Division,
18 Respondent asserts the following affirmative defenses:

- 19 1. The Complaint fails to state facts sufficient to constitute grounds for discipline
- 20 under applicable law.
- 21 2. Respondent did not violate USPAP, NRS, NAC, or any standard of professional
- 22 conduct as alleged.
- 23 3. The allegations concern matters of professional judgment, which do not constitute
- 24 violations absent proof of material noncompliance or public harm.
- 25
- 26
- 27
- 28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- 4. The Division cannot establish materiality or harm sufficient to warrant discipline.
- 5. Respondent acted in good faith and cooperated fully with the Division's investigation.
- 6. To the extent any deficiency is found, mitigation applies.
- 7. Respondent reserves the right to assert additional defenses as permitted by law.

PRAYER FOR RELIEF

WHEREFORE, Respondent respectfully requests that the Commission dismiss the Complaint in its entirety, impose no disciplinary action, and grant such further relief as is just and proper.

Respectfully Submitted,

DATED: April 9, 2026.

KERR SIMPSON ATTORNEYS AT LAW

/s/Taylor Simpson
TAYLOR SIMPSON, ESQ.
Nevada Bar No. 13956
2900 W. Horizon Ridge Parkway, Suite 200
Henderson, Nevada 89052
Telephone No. (702) 451-2055
taylor@kerrsimpsonlaw.com
Attorneys for Respondent