

1 **BEFORE THE COMMISSION FOR COMMON-INTEREST**
2 **COMMUNITIES AND CONDOMINIUM HOTELS**

3 **STATE OF NEVADA**

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

8 Petitioner,

9 vs.

10 CHRISTINA MARIE DEHLINGER,
11 (CAM.0009099 - INACTIVE)

12 Respondent.

Case No. 2023-322

13 **STIPULATION AND ORDER FOR SETTLEMENT OF DISCIPLINARY ACTION**

14 This Stipulation for Settlement of Disciplinary Action (“Stipulation”) is entered into
15 by and between the State of Nevada, Department of Business and Industry, Real Estate
16 Division (“Division”), through its Administrator Sharath Chandra (“Petitioner”), by and
17 through their attorney of record, Christal Park Keegan, and Christina Marie Dehlinger, by
18 and through her attorney of record, Kirk T. Kennedy (“RESPONDENT”).

19 **JURISDICTION AND NOTICE**

20 During all relevant times mentioned in this complaint, RESPONDENT held a
21 community manager certificate from the Division (CAM.0009099) and is, therefore, subject
22 to the jurisdiction of the Division and the provisions of NRS Chapters 116 and 116A and
23 NAC Chapters 116 and 116A. RESPONDENT’S certificate is currently in “inactive” status
24 as of June 30, 2022.

25 **SUMMARY OF FACTUAL ALLEGATIONS SET FORTH IN THE COMPLAINT**

26 1. At all times relevant to this Complaint, RESPONDENT was the community
27 manager for One Turnberry Place Condominium Association (“Association”).

28 2. From about August 2021 through February 2023, the RESPONDENT
embezzled funds from the Association in amounts estimated at \$95,121.79. *EXHIBIT 1.*

1 3. On February 8, 2023, the RESPONDENT confessed to Board of Director Gail
2 Poll that she misappropriated Association funds. *EXHIBIT 5.*

3 4. In February of 2023, RESPONDENT advanced repayment plans that never
4 happened. *EXHIBIT 6.*

5 5. On April 24, 2023, the Division received a complaint against the
6 RESPONDENT for embezzling funds from the Association. *EXHIBIT 1.*

7 6. Therefore, on or about May 3, 2023, the Division sent the RESPONDENT a
8 request for information and/or documents. *EXHIBIT 2.*

9 7. On or about May 30, 2023, the Division sent a second request for information
10 to the RESPONDENT after it had received no response. *EXHIBIT 3.*

11 8. On June 2, 2023, RESPONDENT'S attorney represented to the Division that
12 she was advised not to make any further statements regarding the complaints against her.
13 *EXHIBIT 4.*

14 9. As of June 20, 2023, RESPONDENT has not paid back any of the Association's
15 funds she misappropriated. *EXHIBIT 7.*

16 VIOLATIONS OF LAW

17 10. RESPONDENT violated NRS 116A.630(1)(a) for failing to act as a fiduciary
18 to the client when she embezzled funds from the Association.

19 11. RESPONDENT violated NRS 116A.630(1)(b) for failing to exercise ordinary
20 and reasonable care in the performance of her duties when she deposited Association
21 checks to herself.

22 12. RESPONDENT violated NRS 116A.640(4) for using Association money for her
23 own personal use.

24 13. RESPONDENT violated NRS 116A.640(2)(a) for impeding or otherwise
25 interfering with the Division's investigation by failing to provide documents.

26 ///

27 ///

28 ///

1 14. RESPONDENT violated NAC 116A.355(1)(a) as determined by NAC
2 116A.355(4)(g) by engaging in unprofessional conduct or professional incompetence by
3 failing to act in the best interest of her client when she took Association monies, and never
4 repaid it.

5 **PROPOSED SETTLEMENT AGREEMENT**

6 In an effort to avoid the time and expense of litigating these issues before the
7 Commission, the parties desire to compromise and settle the Division’s findings of
8 violations of law in Case No. 2023-322 upon the following terms and conditions:

9 a. Since the Division’s filing of its Complaint, the RESPONDENT has taken
10 steps to repay her liability towards the \$92,052.50 Proof of Loss filed by the victim/insured
11 Association and has tendered a down payment of \$25,000. RESPONDENT has made
12 additional monthly payments of \$300, and shall continue to make such monthly payments
13 until her obligation is completely repaid.

14 b. RESPONDENT shall pay the Division a total amount of \$1,392.24 (“Amount
15 Due”), consisting of the Division’s incurred costs in the amount of \$450.00, and the
16 Attorney’s pre-hearing fees in the amount of \$942.24, within sixty (60) days of the date of
17 the Order approving this Stipulation and Order.

18 c. RESPONDENT further agrees to voluntarily surrender her community
19 manager certificate, and shall not reapply until the restitution to the Association’s insurer
20 and the Amount Due to the Division is paid in full and final satisfaction, with such
21 reapplication subject to appearance before the Commission for approval of any licensure
22 prior to obtaining licensure.

23 1. RESPONDENT and the Division agree that by entering into this Stipulation,
24 the Division does not concede any defense or mitigation the RESPONDENT may assert
25 and that once this Stipulation is approved and fully performed, the Division will close its
26 file in this matter.

27 ///

28 ///

1 2. RESPONDENT agree and understand that by entering into this Stipulation
2 she is waiving her right to a hearing at which she may present evidence in her defense, her
3 right to a written decision on the merits of the complaint, her rights to reconsideration
4 and/or rehearing, appeal and/or judicial review, and all other rights which may be accorded
5 by the Nevada Administrative Procedure Act, the Nevada Common-Interest Communities
6 and Condominium Hotels statutes and accompanying regulations, and the federal and
7 state Constitutions. The RESPONDENT understands that this Agreement and other
8 documentation may be subject to public records laws. The Commission members who
9 review this matter for approval of this Stipulation may be the same members who
10 ultimately hear, consider, and decide the Complaint if this Stipulation is either not
11 approved by the Commission or is not timely performed by the RESPONDENT. The
12 RESPONDENT fully understands that she has the right to be represented by legal counsel
13 in this matter at her own expense.

14 3. Each party shall bear their own attorney's fees and costs.

15 4. Approval of Stipulation. Once executed, this Stipulation will be filed with the
16 Commission and will be placed on the agenda for approval at its next public meeting. The
17 Division will recommend to the Commission approval of the Stipulation. RESPONDENT
18 agrees that the Commission may approve, reject, or suggest amendments to this
19 Stipulation that must be accepted or rejected by RESPONDENT before any amendment is
20 effective.

21 5. Withdrawal of Stipulation. If the Commission rejects this Stipulation or
22 suggests amendments unacceptable to the RESPONDENT, she may withdraw from this
23 Stipulation, and the Division may pursue its Complaint before the Commission. This
24 Stipulation then shall become null and void and unenforceable in any manner against
25 either party.

26 6. Release. In consideration of the execution of this Stipulation, RESPONDENT
27 for herself, her heirs, executors, administrators, successors, and assigns, hereby releases,
28 remises, and forever discharges the State of Nevada, the Department of Business and

1 Industry, and the Division, and each of their respective members, agents, employees, and
2 counsel in their individual and representative capacities, from any and all manner of
3 actions, causes of action, suits, debts, judgments, executions, claims, and demands
4 whatsoever, known and unknown, in law or equity, that RESPONDENT ever had, now has,
5 may have, or claim to have against any or all of the persons or entities named in this
6 section, arising out of or by reason of the Division's investigation of this action, this
7 disciplinary action, and all matters related thereto.

8 7. Indemnification. RESPONDENT hereby agrees to indemnify and hold
9 harmless the State of Nevada, the Department of Business and Industry, Petitioner, the
10 Division, and each of their respective members, agents, employees, and counsel, in their
11 individual and representative capacities, against any and all claims, suits, and actions
12 brought against said persons and/or entities by reason of the Division's investigation, this
13 disciplinary action, and all other matters relating thereto, and against any and all
14 expenses, damages, and costs, including court costs and attorney fees, which may be
15 sustained by the persons and/or entities named in this section as a result of said claims,
16 suits, and actions.

17 8. Default. In the event of default under any terms of this Stipulation,
18 RESPONDENT agrees that her license shall be immediately suspended, and the unpaid
19 balance of the administrative fine and costs, together with any attorneys' fees and costs
20 that may have been assessed, shall be due in full to the Division within ten (10) calendar
21 days of the date of default. Debt collection actions for unpaid monetary assessments in this
22 case may be instituted by the Division or its assignee.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 9. RESPONDENT has signed and dated this Stipulation only after reading and
2 understanding all terms herein.

3
4 DATED: October 31, 2023.

NEVADA DEPARTMENT OF BUSINESS
AND INDUSTRY, REAL ESTATE DIVISION

5
6 By: 
7 SHARATH CHANDRA, Administrator

8 DATED: October 31, 2023.

RESPONDENT

9
10 By: Tina M. Dehlinger
11 CHRISTINA MARIE DEHLINGER

12
13 Approved as to form:

14 AARON D. FORD
15 Attorney General

16 By: 
17 CHRISTAL P. KEEGAN
18 Deputy Attorney General
19 Bar No. 12725
20 5420 Kietzke Lane, #202
21 Reno, Nevada 89511
22 (775) 687-2141
23 Attorney for Real Estate Division

Approved as to form:

LAW OFFICE OF KIRK T. KENNEDY

24
25 By: 
26 KIRK T. KENNEDY
27 Bar No. 5032
28 815 S. Casino Center Blvd.
Las Vegas, NV 89101
(702) 383-5534
Attorney for Respondent

1 **BEFORE THE COMMISSION FOR COMMON-INTEREST**
2 **COMMUNITIES AND CONDOMINIUM HOTELS**

3 **STATE OF NEVADA**

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

8 Petitioner,

9 vs.

10 CHRISTINA MARIE DEHLINGER,
11 (CAM.0009099 - INACTIVE)

12 Respondent.

Case No. 2023-322

13 **IT IS ORDERED** that the foregoing Stipulation and Order for Settlement of
14 Disciplinary Action is approved in full.

15 Dated: December _____, 2023

16 COMMISSION FOR COMMON-INTEREST
17 COMMUNITIES AND CONDOMINIUM
18 HOTELS, DEPARTMENT OF BUSINESS
19 AND INDUSTRY, STATE OF NEVADA

20 By: _____
21 PHYLLIS TOMASSO, Chairman

22 Submitted by:

23 AARON D. FORD
24 Attorney General

25 By: *epkeegan*
26 CHRISTAL P. KEEGAN (Bar No. 12725)
27 Deputy Attorney General
28 5420 Kietzke Lane, #202
 Reno, Nevada 89511
 (775) 687-2141
 ckeegan@ag.nv.gov
 Attorney for Real Estate Division