

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

SHARATH CHANDRA, Administrator,  
REAL ESTATE DIVISION, DEPARTMENT  
OF BUSINESS & INDUSTRY,  
STATE OF NEVADA,

Case No. 2018-57

Petitioner,

vs.

NEIL ARBRY DICKINSON JR.,

Respondent.

**FILED**

SEP 24 2018

REAL ESTATE COMMISSION  
BY

**STIPULATION FOR SETTLEMENT OF DISCIPLINARY ACTION**

This Stipulation for Settlement of Disciplinary Action (“Stipulation”) is entered into between the Petitioner, State of Nevada, Department of Business and Industry, Real Estate Division (“Division”), through its Administrator, Sharath Chandra, and Respondent, Neil Arbry Dickinson Jr. (“Respondent”).

**JURISDICTION**

RESPONDENT was at all relevant times mentioned in this Complaint licensed by the Division as a Salesperson under license number S.0181953, and is therefore subject to the jurisdiction of the Division and the Commission and the provisions of NRS Chapter 645 and NAC Chapter 645.

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

1. RESPONDENT has been licensed as a Salesperson, license number S.0181953, since June 7, 2017, and that license is currently in active status.

2. On or about January 9, 2018, before the Eighth Judicial District Court for Clark County, Nevada, RESPONDENT entered into a Guilty Plea Agreement in which he pled “guilty to: CHILD ABUSE, NEGLECT, OR ENDANGERMENT (Gross Misdemeanor – NRS 200.508.2 – NOC 55239).”

3. On or about June 26, 2018, the Eighth Judicial District Court for Clark County, Nevada sentenced RESPONDENT to (a) 364 days of imprisonment (suspended), and (b) up to two years of probation.

...

1                                   **SUMMARY OF VIOLATIONS OF LAW ALLEGED IN COMPLAINT**

2           1.       RESPONDENT violated NRS 645.633(1)(d)(2) by being convicted of a crime involving  
3 moral turpitude.

4                                   **SETTLEMENT**

5           1.       The Division was prepared to present its case based upon the Complaint filed with the  
6 Commission.

7           2.       Respondent admits the facts and violations of law as alleged in the Complaint.

8           3.       The Parties desire to compromise and settle the instant controversy upon the following  
9 terms and conditions.

10          4.       Respondent agrees to the voluntary surrender of his license and further agrees to not  
11 apply for any real estate license or permit in Nevada for five (5) years from the effective date of this  
12 Order. Should Respondent wish to apply for any license thereafter, Respondent must appear before the  
13 Commission before submitting an application for licensure.

14          5.       The Division agrees not to pursue any other or greater remedies or fines in connection  
15 with Respondent's alleged conduct referenced herein.

16          6.       Respondent and the Division agree that by entering into this Stipulation, the Division  
17 does not concede any defense or mitigation Respondent may assert and that once this Stipulation is  
18 approved and fully performed, the Division will close its file in this matter.

19          7.       Respondent agrees and understands that by entering into this Stipulation, Respondent is  
20 waiving her right to a hearing at which Respondent may present evidence in her defense, her right to a  
21 written decision on the merits of the complaint, her rights to reconsideration and/or rehearing, appeal  
22 and/or judicial review, and all other rights which may be accorded by the Nevada Administrative  
23 Procedure Act, the Nevada Real Estate Brokers and Salespersons statutes and accompanying  
24 regulations, and the federal and state constitutions. Respondent understands that this Agreement and  
25 other documentation may be subject to public records laws. The Commission members who review  
26 this matter for approval of this Stipulation may be the same members who ultimately hear, consider and  
27 decide the Complaint if this Stipulation is either not approved by the Commission or is not timely  
28 performed by Respondent. Respondent fully understands that she has the right to be represented by

1 legal counsel in this matter at her own expense.

2 8. Respondent shall bear his own attorney's fees and costs.

3 9. Stipulation is Not Evidence. Neither this Stipulation nor any statements made  
4 concerning this Stipulation may be discussed or introduced into evidence at any hearing on the  
5 Complaint, if the Division must ultimately present its case based on the Complaint filed in this matter.

6 10. Approval of Stipulation. Once executed, this Stipulation will be filed with the  
7 Commission and will be placed on the agenda for approval at its September 2018 public meeting. The  
8 Division will recommend to the Commission approval of the Stipulation. Respondent agrees that the  
9 Commission may approve, reject, or suggest amendments to this Stipulation that must be accepted or  
10 rejected by Respondent before any amendment is effective.

11 11. Withdrawal of Stipulation. If the Commission rejects this Stipulation or suggests  
12 amendments unacceptable to Respondent, Respondent may withdraw from this Stipulation and the  
13 Division may pursue its Complaint before the Commission at the Commission's next regular public  
14 meeting. This Stipulation shall then become null and void, and unenforceable in any manner against  
15 either party.

16 12. Release. In consideration of execution of this Stipulation, the Respondent for himself,  
17 his heirs, executors, administrators, successors, and assigns, hereby release, remise, and forever  
18 discharge the State of Nevada, the Department of Business and Industry and the Division, and each of  
19 their respective members, agents, employees and counsel in their individual and representative  
20 capacities, from any and all manner of actions, causes of action, suits, debts, judgments, executions,  
21 claims, and demands whatsoever, known and unknown, in law or equity, that the Respondent ever had,  
22 now has, may have, or claim to have, against any or all of the persons or entities named in this section,  
23 arising out of or by reason of the Division's investigation, this disciplinary action, and all other matters  
24 relating thereto.

25 13. Indemnification. Respondent hereby indemnifies and holds harmless the State of  
26 Nevada, the Department of Business and Industry, the Division, and each of their respective members,  
27 agents, employees and counsel in their individual and representative capacities against any and all  
28 claims, suits, and actions brought against said persons and/or entities by reason of the Division's

1 investigation, this disciplinary action and all other matters relating thereto, and against any and all  
2 expenses, damages, and costs, including court costs and attorney's fees, which may be sustained by the  
3 persons and/or entities named in this section as a result of said claims, suits, and actions.

4 14. Respondent has signed and dated this Stipulation only after reading and understanding  
5 all terms herein.

6  
7 Dated: 8/7/18

By:   
Neil Arby Dickinson Jr., Respondent

8  
9 Dated: 09/10/18

State of Nevada  
Department of Business and Industry  
Real Estate Division

10  
11  
12 By:   
13 Sharath Chandra, Administrator  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER APPROVING STIPULATION**

1  
2 The Stipulation for Settlement of Disciplinary Action having come before the Real Estate  
3 Commission, Department of Business and Industry, State of Nevada, during its regular agenda on  
4 September 10, 2018, and the Commission being fully apprised in the premises, and good cause  
5 appearing,

6 IT IS ORDERED that the above Stipulation is approved in full.

7 This Order shall become effective on the 24 day of October, 2018.

8 Dated this 24 day of Sept., 2018.

9 NEVADA REAL ESTATE COMMISSION

10  
11 By:   
12 President, Nevada Real Estate Commission  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28