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BEFORE THE REAL ESTATE COMMISSION
STATE OF NEVADA

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

Petitioner,

vs.

ARTHUR TANGORA CARLL a/k/a ARTHUR
C. TANGORA,

Respondent.

Case No. 2016-8715

FILED

JUN 14 2019

REAL ESTATE COMMISSION

BY *Patrick Sauter*

STIPULATION FOR SETTLEMENT OF DISCIPLINARY ACTION

This Stipulation for Settlement of Disciplinary Action ("Stipulation") is entered into by and between the State of Nevada, Department of Business and Industry, Real Estate Division ("Division"), through its Administrator Sharath Chandra ("Petitioner"), and Arthur Tangora Carll a/k/a Arthur C. Tangora ("RESPONDENT").

JURISDICTION

RESPONDENT engaged in activities which require a license as a real estate salesperson issued by the Division and is, therefore, subject to the jurisdiction of the Division and the provisions of NRS Chapter 645 and NAC Chapter 645.

FACTUAL ALLEGATIONS IN COMPLAINT

1. RESPONDENT has had a license as a salesperson, license number S.0167677.
2. At all times relevant to this complaint, RESPONDENT was a salesperson associated with NAI Vegas. Patrick Sauter ("SAUTER"), license number B.0045077.LLC, was his supervising broker.
3. On February 29, 2016, RESPONDENT's license lapsed because RESPONDENT failed to renew it, and it remained in lapsed status until it was reinstated on November 1, 2016.
4. During the lapse period RESPONDENT engaged in advertising the services of a real estate salesperson without an active a license from the Division to perform such activities.

...

1 **DISCIPLINE AUTHORIZED**

2 14. Pursuant to NRS 645.235, the Commission is empowered to impose an administrative fine
3 in an amount not to exceed the amount of gain or economic benefit that the person derived from the
4 violation or \$5,000, whichever amount is greater, against RESPONDENT for each violation of NRS
5 645.230 or NRS 645.235.

6 15. Pursuant to NRS 645.630 and NRS 645.633, the Commission is empowered to impose an
7 administrative fine in an amount not to exceed \$10,000 for each violation of NRS 645.633.

8 16. Additionally, under NRS Chapter 622, the Commission is authorized to impose costs of
9 the proceeding upon RESPONDENT, including investigative costs and attorney's fees, if the
10 Commission otherwise imposes discipline on RESPONDENT.

11 **PROPOSED STIPULATION AGREEMENT**

12 1. In an effort to avoid the time and expense of litigating these issues before the Commission,
13 the parties desire to compromise and settle the instant controversy upon the following terms and
14 conditions:

15 a. RESPONDENT agrees to pay \$20,000 to the Division in fines and \$986.23 in costs as
16 follows:

- 17 • On or before June 30, 2019: \$9,000 in fines and \$986.23 in costs
- 18 • On or before August 30, 2019: \$5,000 in fines
- 19 • On or before October 31, 2019: \$6,000 in fines

20 b. RESPONDENT agrees that he will complete twelve hours of continuing education in
21 law/legislative, three hours in ethics, and three hours in agency, by August 11, 2019.

22 2. RESPONDENT and the Division agree that by entering into this Stipulation, the Division
23 does not concede any defense or mitigation RESPONDENT may assert and that once this Stipulation is
24 approved and fully performed, the Division will close its file in this matter. Nothing herein prevents proof
25 and giving consideration to acts complained of in this matter in determining or penalizing a future
26 violation by RESPONDENT of any provision of NRS Chapter 645 or NAC Chapter 645.

27 3. RESPONDENT agrees and understands that by entering into this Stipulation,
28 RESPONDENT is waiving his right to a hearing at which RESPONDENT may present evidence in his

1 defense, his right to a written decision on the merits of the complaint, his rights to reconsideration and/or
2 rehearing, appeal and/or judicial review, and all other rights which may be accorded by the Nevada
3 Administrative Procedure Act, the Nevada Real Estate Brokers and Salespersons statutes and
4 accompanying regulations, and the federal and state Constitutions. RESPONDENT understands that this
5 Agreement and other documentation may be subject to public records laws. The Commission members
6 who review this matter for approval of this Stipulation may be the same members who ultimately hear,
7 consider, and decide the Complaint if this Stipulation is either not approved by the Commission or is not
8 timely performed by RESPONDENT. RESPONDENT fully understands that he has the right to be
9 represented by legal counsel in this matter at his own expense.

10 4. Each party shall bear its or his own attorney's fees and costs, except as provided above.

11 5. Approval of Stipulation. Once executed, this Stipulation will be filed with the
12 Commission and will be placed on the agenda for approval at its June 11-13, 2019, public meeting. The
13 Division will recommend to the Commission approval of the Stipulation. RESPONDENT agrees that
14 the Commission may approve, reject, or suggest amendments to this Stipulation that must be accepted or
15 rejected by RESPONDENT before any amendment is effective.

16 6. Withdrawal of Stipulation. If the Commission rejects this Stipulation or suggests
17 amendments unacceptable to RESPONDENT, RESPONDENT may withdraw from this Stipulation, and
18 the Division may pursue its Complaint before the Commission at the June 11-13, 2019, public meeting.
19 This Stipulation then shall become null and void and unenforceable in any manner against either party.

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

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

8 9. Default. In the event of default, RESPONDENT agrees that his license shall be
9 immediately suspended, and the unpaid balance of the administrative fine and costs, together with any
10 attorney's fees and costs that may have been assessed, shall be due in full to the Division within ten
11 calendar days of the date of default. Debt collection actions for unpaid monetary assessments in this case
12 may be instituted by the Division or its assignee. RESPONDENT agrees that his license shall be
13 immediately suspended if he fails to timely attend and complete the above continuing education.
14 RESPONDENT agrees that the suspension of his license shall continue until the continuing education is
15 completed.

16 10. RESPONDENT has signed and dated this Stipulation only after reading and
17 understanding all terms herein.

18 DATED this 10th day of June, 2019.

DATED this 13 day of June, 2019.

19
20
21 By: 
22 ARTHUR C. TANGORA

NEVADA DEPARTMENT OF BUSINESS
& INDUSTRY, REAL ESTATE DIVISION
23 By: 
24 SHARATH CHANDRA
25 Administrator

23 Approved as to form:

Approved as to form:

24 AARON D. FORD
25 Attorney General

SKAR WILLIAMS, PLLC

26 By: _____
27 DENNIS L. BELCOURT
28 Deputy Attorney General
555 E. Washington Avenue, Suite 3900
Las Vegas, NV 89101

By: 
JOHNATHON FAYEGHI, ESQ.
410 South Rampart Boulevard, Suite 350
Las Vegas, NV 89145
Attorney for Respondent

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

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14 RESPONDENT agrees that the suspension of his license shall continue until the continuing education is
15 completed.

16 10. RESPONDENT has signed and dated this Stipulation only after reading and
17 understanding all terms herein.

18 DATED this ____ day of June, 2019.

DATED this ____ day of June, 2019.

19
20
21 By: _____
22 ARTHUR C. TANGORA

NEVADA DEPARTMENT OF BUSINESS
& INDUSTRY, REAL ESTATE DIVISION

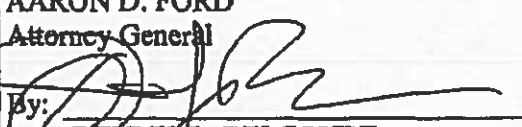
21 By: _____
22 SHARATH CHANDRA
23 Administrator

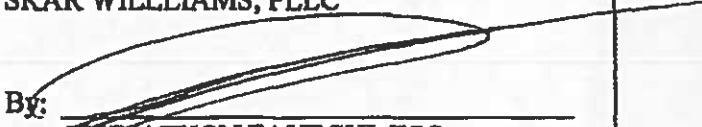
23 Approved as to form:

Approved as to form:

24 AARON D. FORD
25 Attorney General

SKAR WILLIAMS, PLLC

26 By: 
27 DENNIS L. BELCOURT
28 Deputy Attorney General
 555 E. Washington Avenue, Suite 3900
 Las Vegas, NV 89101

By: 
JOHNATHON FAYEGHI, ESQ.
410 South Rampart Boulevard, Suite 350
Las Vegas, NV 89145
Attorney for Respondent

1 BEFORE THE REAL ESTATE COMMISSION
2 STATE OF NEVADA

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

Case No. 2016-3715

Petitioner,

7 vs.

8 ARTHUR TANGORA CARLL a/k/a ARTHUR
9 C. TANGORA,

Respondent.

10
11 ORDER APPROVING STIPULATION

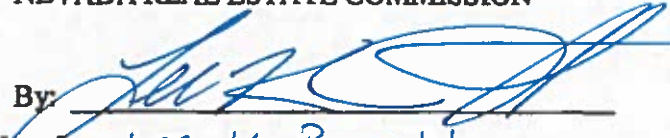
12 The Stipulation for Settlement of Disciplinary Action having come before the Real Estate
13 Commission, Department of Business and Industry, State of Nevada, during its regular agenda on June
14 11, 2019, and the Commission being fully apprised of terms and good cause appearing,

15 IT IS ORDERED that the Stipulation for Settlement of Disciplinary Action in this matter is
16 approved in full.

17 This Order shall become effective on the 14th day of July, 2019.

18
19 Dated this 14th day of June, 2019.

20 NEVADA REAL ESTATE COMMISSION

21 By: 

22 [Print Name] Lee K. Barrett
23 Commission President