

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

REAL ESTATE COMMISSION  
BY *Evelyn Taitte*  
Case No. 2018-160

Petitioner,

**STIPULATION FOR SETTLEMENT OF  
DISCIPLINARY COMPLAINT**

vs.

KATHERINE D. SCHANDER,

Respondent.

The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY OF THE STATE OF NEVADA ("Division"), by and through its counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Peter Keegan, Deputy Attorney General, hereby notifies RESPONDENT KATHERINE D. SCHANDER ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL ESTATE COMMISSION ("Commission"). The hearing will be held pursuant to Chapter 233B and Chapter 645 of the Nevada Revised Statutes ("NRS") and Chapter 645 of the Nevada Administrative Code ("NAC"). The purpose of the hearing is to consider the allegations stated below and to determine if the RESPONDENT should be subject to an administrative penalty or other discipline authorized by NRS 645 and/or NAC 645, if violations of law are proven.

**JURISDICTION**

RESPONDENT engaged in activities that require a license as a real estate broker, real estate broker-salesperson, or real estate salesperson, and/or a permit to engage in property management, issued by the Division and is, therefore, subject to the jurisdiction of the Division and the Commission, and the provisions of NRS and NAC 645.

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1 **PROCEDURAL HISTORY**

2 1. On or about January 30, 2018, the Division received a statement of fact  
3 (“complaint”) that RESPONDENT provided unprofessional property management services  
4 to the complainant.

5 2. On or about February 5, 2018, the Division sent an investigation-opening  
6 letter to RESPONDENT, which required RESPONDENT to provide a sworn statement  
7 responding to the complaint as well as copies of relevant property management files for the  
8 involved properties.

9 3. On or about February 20, 2018, the Division received the RESPONDENT’s  
10 sworn affidavit and property management files.

11 4. On or about March 1, 2018, the Division sent to the RESPONDENT, a Cease  
12 and Desist Order, demanding the RESPONDENT cease and desist from engaging in the  
13 business of, real estate property management or any other activity requirement licensure  
14 under NRS 645.

15 5. On or about June 27, 2018, the Division sent RESPONDENT an NRS 233B  
16 letter indicating that the Division’s investigation had obtained sufficient evidence to  
17 commence disciplinary action by filing a complaint with the Nevada Real Estate  
18 Commission (“Commission”).

19 **FACTUAL ALLEGATIONS**

20 1. At all times relevant, RESPONDENT was not licensed by the Division in  
21 any capacity.

22 2. On or about August 17, 2010, the RESPONDENT signed a one-year  
23 residential lease agreement as the agent for the property owners of 203 Blue Skies,  
24 Sparks, NV 89426 (“Blue Skies”).

25 3. The Respondent continued to provide property management services for the  
26 property owners of Blue Skies through at least October of 2017.

1           4.     On or about January 6, 2015, the RESPONDENT signed a one-year  
2 residential lease agreement as the agent for the property owners of 7510 Paha Rah Dr.,  
3 Sparks, NV 89436 ("Pah Rah").

4           5.     The RESPONDENT continued to provide property management services for  
5 the property owners of Pah Rah through at least April of 2017.

6           6.     On or about May 14, 2015, the RESPONDENT signed a one-year residential  
7 lease agreement as the agent for the property owners of 3490 Golden Valley Road, Reno,  
8 NV 89506 ("Golden Valley").

9           7.     The RESPONDENT continued to provide property management services for  
10 the owners of Golden Valley through at least October 2017.

11          8.     On or about October 28, 2015, the RESPONDENT signed a one-year  
12 residential lease agreement as the agent for the property owners of 1543 Satellite Drive,  
13 Sparks, NV 89436 ("Satellite Drive").

14          9.     The RESPONDENT continued to provide property management services for  
15 the owners of Satellite Drive through at least October 2016.

16          10.    On or about September 27, 2017, the RESPONDENT signed a one-year  
17 residential lease agreement as the agent for the property owners of 1255 Ian St., Sparks,  
18 NV 89434 ("Ian St.").

19          11.    The RESPONDENT continued to provide property management services for  
20 the owners of Ian St. through at least November 2017.

21          12.    On or about September 29, 2017, the RESPONDENT signed a one-year  
22 residential lease agreement as the agent for the property owners of 2825 Watervale Dr.,  
23 Sparks, NV 89436 ("Watervale Dr.").

24          13.    The RESPONDENT continued to provide property management services for  
25 the owners of Watervale Dr. through at least November 2017.

26          14.    On or about October 31, 2017, the RESPONDENT signed a one-year  
27 residential lease agreement as the agent for the property owners of 2755 Ashland Ave.,  
28 Sparks, NV 89436 ("Ashland Ave.").

1           15.    The RESPONDENT continued to provide property management services for  
2 the owners of Watervale Dr. through at least November 2017.

3           16.    In July 2013, RESPONDENT appeared before the Nevada Real Estate  
4 Commission for acting in the capacity of a property manager without holding a real estate  
5 license or property manager's permit.

6           17.    At the July 2013, hearing, the Nevada Real Estate Commission accepted a  
7 stipulated agreement between the RESPONDENT and the Division wherein the  
8 RESPONDENT agreed to pay a \$5,000.00 fine for unlicensed activity and to cease and  
9 desist from managing properties.

10          18.    On or about June 20, 2016, the RESPONDENT received check number 3013  
11 in the amount of \$700.00 for her work as the property manager for the property owners of  
12 Blue Skies, Pah Rah, Golden Valley, Satellite Drive, Ian St., Watervale Dr., and Ashland  
13 Ave. (collectively "the Properties").

14          19.    On or about September 20, 2016, the RESPONDENT received check number  
15 3045 in the amount of \$700.00 for her work as the property manager for the property  
16 owners of the Properties.

17          20.    On or about December 24, 2016, the RESPONDENT received check number  
18 3080 in the amount of \$700.00 for her work as the property manager for the property  
19 owners of the Properties.

20          21.    On or about February 25, 2017, the RESPONDENT received check number  
21 3101 in the amount of \$700.00 for her work as the property manager for the property  
22 owners of the Properties.

23          22.    On or about April 22, 2017, the RESPONDENT received check number 3125  
24 in the amount of \$700.00 for her work as the property manager for the property owners of  
25 the Properties.

26          23.    On or about June 28, 2017, the RESPONDENT received check number 3162  
27 in the amount of \$700.00 for her work as the property manager for the property owners of  
28 the Properties.





1 accompanying regulations, and the federal and state Constitutions. RESPONDENT  
2 understands that this Agreement and other documentation may be subject to public records  
3 laws. The Commission members who review this matter for approval of this Stipulation  
4 may be the same members, who ultimately hear, consider, and decide the Complaint if this  
5 Stipulation is either not approved by the Commission or is not timely performed by  
6 RESPONDENT. RESPONDENT fully understands that she has the right to be  
7 represented by legal counsel in this matter at her own expense.

8         6. Each party shall bear its own attorney's fees and costs.

9         7. Approval of Stipulation. This Stipulation is subject to approval by the  
10 Commission at a public meeting.

11         8. **Release.** In consideration of the execution of this Stipulation, the Division  
12 and the RESPONDENT, for themselves, their heirs, executors, administrators, successors,  
13 employees, officers and assigns, hereby release, remise, and forever discharge each other,  
14 and each of their respective members, agents, employees, and counsel in their individual  
15 and representative capacities, from any and all manner of actions, causes of action, suits,  
16 debts, judgments, executions, claims, and demands whatsoever, known and unknown, in  
17 law or equity, that the Division or RESPONDENT ever had, now has, may have, or claim  
18 to have against any or all of the persons or entities named in this section, arising out of,  
19 relating to the facts and circumstances of the Division's investigation, this disciplinary  
20 action, and all other matters relating thereto.


21         9. **Indemnification.** RESPONDENT hereby indemnifies and holds harmless  
22 the State of Nevada, the Department of Business and Industry, the Division, and each of  
23 their respective members, agents, employees, and counsel, in their individual and  
24 representative capacities, against any and all claims, suits, and actions brought against  
25 said persons and/or entities by reason of the Division's investigation, this disciplinary  
26 action, and all other matters relating thereto, and against any and all expenses, damages,  
27 and costs, including court costs and attorney fees, which may be sustained by the persons  
28 and/or entities named in this section as a result of said claims, suits, and actions.

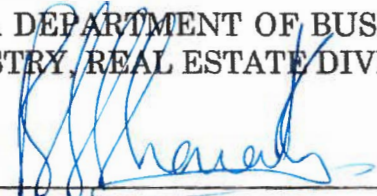
1 The parties have signed and dated this Stipulation only after reading and  
2 understanding all terms herein.

3 DATED this 27<sup>th</sup> day of August 2020.

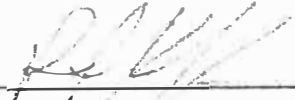
DATED this 27 day of August 2020.

4 NEVADA DEPARTMENT OF BUSINESS  
5 & INDUSTRY, REAL ESTATE DIVISION

6  
7 By:   
8 **KATHERINE D. SCHANDER**  
Respondent

By:   
**SHARATH CHANDRA**  
Administrator

9  
10 Approved as to form:  
AARON D. FORD  
11 Attorney General

12 By:   
13 **PETER K. KEEGAN**  
14 Deputy Attorney General  
Attorney for the Real Estate Division



1 **BEFORE THE REAL ESTATE COMMISSION**

2 **STATE OF NEVADA**

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

**Case No. 2018-160**

Petitioner,

vs.

8 KATHERINE D. SCHANDER,

9 Respondent.

10 **ORDER APPROVING STIPULATION**

11 The Stipulation for Settlement of Disciplinary Action having come before the Real  
12 Estate Commission, Department of Business and Industry, State of Nevada, during its  
13 regular agenda on September 1, 2020, and the Commission being fully apprised of  
14 terms and good cause appearing,

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

17 This Order shall become effective on the 1<sup>st</sup> day of September 2020.

18  
19  
20 **NEVADA REAL ESTATE COMMISSION**

21  
22 By: 

23 [Print Name] Devin Reiss

24 Commission President