

APR 01 2022

REAL ESTATE COMMISSION

BY *Emily Patten*

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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,

Case No. 2019-1339

Petitioner,

vs.

SHAWN CHRISTOPHER,

Respondent.

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"), by and through their attorney of record, Deputy Attorney General Matthew Feeley and SHAWN CHRISTOPHER ("RESPONDENT").

JURISDICTION

RESPONDENT is licensed as a real estate broker-salesperson by the Division. He is therefore subject to the jurisdiction of the Division and the Commission and the provisions of NRS chapter 645 and NAC chapter 645.

FACTUAL ALLEGATIONS

1. RESPONDENT was licensed by the Division as a salesperson, under license S.0022711, said license being issued on June 30, 1989, and was active until June 18, 1990, and then again on June 20, 1990 until October 26, 1990.

2. RESPONDENT was licensed by the Division as a salesperson, under license S.0048452, said license being issued on January 10, 2001, and was active until March 29, 2001, and then again on April 11, 2001, until February 1, 2003.

3. RESPONDENT was licensed by the Division as a salesperson, under license S.0168759, said license being issued on November 16, 2009, and was active until October 3, 2012.

1 4. RESPONDENT was licensed by the Division as a broker, under license
2 B.1001066.CORP. said license being issued on October 3, 2012, and was active until December 3, 2013.

3 5. RESPONDENT was licensed by the Division as a real estate broker-salesperson, under
4 license BS.1001066, said license being issued on May 24, 2018, and is in "active" status.

5 6. RESPONDENT was and/or is a broker-salesperson with REISS REALTY.

6 7. On December 5, 2019, Donald Mazzula ("Complainant") filed a complaint with the
7 Division against RESPONDENT related to property located at 227 S. Texas, Henderson, NV 89015 ("the
8 Property").

9 8. Complainant alleged that he had known RESPONDENT as RESPONDENT has been his
10 attorney for the past 20 years.

11 9. Complainant further alleged that RESPONDENT had formed DTHD, LLC in or around
12 March of 2017.

13 10. Complainant alleged that RESPONDENT approached Complainant and proposed that
14 Complainant invest in a single-family house "flip" which RESPONDENT estimated would take 4 months
15 to renovate and re-sell. RESPONDENT told Complainant that he has done this with at least two other
16 properties.

17 11. Complainant alleged that RESPONDENT explained that he was short on cash due to the
18 impending sale of his two other properties. Complainant further alleges that they agreed that Complainant
19 would become owner of 50% of DTHD, LLC which allegedly had no assets or liabilities. Complainant
20 further alleges that as part of the agreement, Complainant would purchase the Property for cash on behalf
21 of the LLC and RESPONDENT would perform the improvements and upon sale of the Property, they
22 would each reimburse themselves their respective expenditures and split the profit 50/50.

23 12. On June 8, 2017, Complainant wired \$138,000 to WFG Title Company to complete
24 purchase of the Property that was to be owned by the LLC.

25 13. On June 9, 2017, the deed was transferred to DTHD, LLC.

26 14. On June 19, 2017, RESPONDENT took out a hard money loan in the amount of \$53,000
27 using the Property as collateral.

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1 engaged in a deceitful, fraudulent or dishonest dealing with the Complainant by transferring ownership
2 of DTHD, LLC to Complainant knowing that the loan on the Property (held in the LLC) was in default,
3 leaving Complainant responsible for the repayment of a loan of which he was not even aware.

4 **PROPOSED STIPULATION AGREEMENT**

5 25. In an effort to avoid the time and expense of litigating these issues before the
6 Commission, the parties desire to compromise and settle the instant controversy upon the following terms
7 and conditions:

- 8 a. RESPONDENT agrees to voluntarily surrender back to the Division any and all
9 licenses issued by the Division.
- 10 b. RESPONDENT agrees to not apply or reapply for any licenses issued by the
11 Division for a period of ten years.
- 12 c. RESPONDENT agrees to pay the Division their fees and costs in the amount of
13 \$1,146.16. RESPONDENT shall pay to the Division \$100 per month (the last
14 payment being in the amount of \$46.16, or whatever remains), starting one month
15 after the entry of Order Approving this Stipulation and until the amount is fully
16 paid. RESPONDENT shall be permitted to pay off the amount sooner if he so
17 chooses.
- 18 d. RESPONDENT, by agreeing to this settlement, does not admit to the factual
19 allegations or that any violations occurred.

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

25 27. RESPONDENT agrees and understands that by entering into this Stipulation,
26 RESPONDENT is waiving his right to a hearing at which RESPONDENT may present evidence in his
27 defense, his right to a written decision on the merits of the complaint, his rights to reconsideration and/or
28 rehearing, appeal and/or judicial review, and all other rights which may be accorded by the Nevada

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

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

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

14 30. Withdrawal of Stipulation. If the Commission rejects this Stipulation or suggests
15 amendments unacceptable to RESPONDENT, RESPONDENT may withdraw from this Stipulation, and
16 the Division may pursue its Complaint before the Commission. This Stipulation then shall become null
17 and void and unenforceable in any manner against either party.

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


27 32. Indemnification. RESPONDENT hereby agrees to indemnify and hold harmless the State
28 of Nevada, the Department of Business and Industry, Petitioner, the Division, and each of their respective

1 members, agents, employees, and counsel, in their individual and representative capacities, against any
2 and all claims, suits, and actions brought against said persons and/or entities by reason of the Division's
3 investigation, this disciplinary action, and all other matters relating thereto, and against any and all
4 expenses, damages, and costs, including court costs and attorney fees, which may be sustained by the
5 persons and/or entities named in this section as a result of said claims, suits, and actions.

6 33. Default. In the event of default, RESPONDENT agrees that his license shall be
7 immediately suspended, and the unpaid balance of the administrative fine and costs, together with any
8 attorney's fees and costs that may have been assessed, shall be due in full to the Division within ten
9 calendar days of the date of default. Debt collection actions for unpaid monetary assessments in this case
10 may be instituted by the Division or its assignee.

11 34. RESPONDENT has signed and dated this Stipulation only after reading and
12 understanding all terms herein.

13
14 DATED this 25th day of March, 2022


15
16
17 By: 
18 SHAWN CHRISTOPHER

DATED this 25 day of March, 2022.

19
20 NEVADA DEPARTMENT OF BUSINESS
& INDUSTRY, REAL ESTATE DIVISION
21 By: 
22 SHARATH CHANDRA
23 Administrator

24 Approved as to form:

25 AARON D. FORD
26 Attorney General

27 By: 
28 MATTHEW FEELEY (Bar #13336)
Deputy Attorney General
555 E. Washington Avenue, Suite 3900
Las Vegas, NV 89101

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ORDER APPROVING STIPULATION

The Stipulation for Settlement of Disciplinary Action having come before the Real Estate Commission, Department of Business and Industry, State of Nevada, during its regular agenda on March 29, 2022, and the Commission being fully apprised of the terms and good cause appearing,

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

This Order shall become effective on the 29 day of March, 2022.

Dated this 1st day of April, 2022.

NEVADA REAL ESTATE COMMISSION

By: Darrell Plummer

[Print Name] Darrell Plummer

Commission President