

MAY 16 2023

REAL ESTATE COMMISSION

BEFORE THE REAL ESTATE COMMISSION

BY *Kelly Valaden*

STATE OF NEVADA

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

Case No. 2022-119

Petitioner,

vs.

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

TYLER SCOTT RICHARDSON,
(S.0183650)

Respondent.

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, Christal Park Keegan, and Tyler Scott Richardson ("RESPONDENT").

RESPONDENT, at all relevant times mentioned in this Complaint, held himself out and/or otherwise performed acts as a person required to have a license under his Salesperson license number S.0183650. RESPONDENT 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 FACTUAL ALLEGATIONS SET FORTH IN THE COMPLAINT

1. RESPONDENT's license history demonstrates periods of license expiration followed by gaps of inactive status prior to renewal. *NRED 000004.*

2. At all times relevant to this Complaint, RESPONDENT acted in the capacity of a real estate licensee but did not hold an active real estate license from February 1, 2021 to February 1, 2022. *NRED 000040 - 000041, NRED 000031 - 000032, NRED 000004, NRED 000017 - 000030, NRED 000169 - 000171, NRED 000409 - 000420, NRED 000423 - 000426, NRED 000446, and NRED 000450 - 000452.*

1 Due”), consisting of a \$7,000.00 fine imposed by the Division, the Division’s pre-hearing costs and fees
2 in the amount of \$425.00, and the Attorney’s pre-hearing costs and fees in the amount of \$2,282.00 within
3 48-months.

4 a. The Amount Due shall be payable to the Division as follows:

5 RESPONDENT shall pay \$200 a month, with monthly payments to start sixty (60) days after
6 approval of this Stipulation by the Commission, as follows:

7 **1st Year: 12 payments at \$200/month**

8 **2nd Year: 12 payments at \$200/month**

9 **3rd Year: 12 payments at \$200/month**

10 **4th Year: 11 payments at \$200/month**

11 With \$307 to be paid on the 12th and final payment in the 4th year for a total payment of \$9,707.00,
12 as being the total Amount Due hereunder. At any time, RESPONDENT may elect to make pre-payments
13 on the Amount Due with no penalties so long as the monthly amount due in the annual period is satisfied
14 in full as specified above.

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16 b. RESPONDENT further agrees to complete a total of 30 hours of live, continuing
17 education in the relevant areas of six (6) hours of agency, six (6) hours of law and legislation, six (6)
18 hours of contracts, six (6) hours of ethics, and six (6) hours of risk reduction, which shall not be counted
19 towards his license renewal requirements. RESPONDENT shall complete the education set forth herein
20 with 120 days from the date of the Order approving this Stipulation.

21
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 files in these matters, provided that, if any
25 further violations are discovered in these matters beyond the scope of facts and violations already pled
26 in the Complaints, the Division is not barred from further reviewing any of the same to determine if any
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1 such further violations not already covered in the Complaints have taken place and should subject
2 RESPONDENT to further disciplinary action.

3 3. RESPONDENT agrees and understands that by entering into this Stipulation
4 RESPONDENT is waiving his right to a hearing at which RESPONDENT may present evidence in his
5 defense, his right to a written decision on the merits of the complaint, his rights to reconsideration and/or
6 rehearing, appeal and/or judicial review, and all other rights which may be accorded by the Nevada
7 Administrative Procedure Act, the Nevada Real Estate Brokers and Salespersons statutes and
8 accompanying regulations, and the federal and state Constitutions. RESPONDENT understands that this
9 Agreement and other documentation may be subject to public records laws. The Commission members
10 who review this matter for approval of this Stipulation may be the same members who ultimately hear,
11 consider, and decide the Complaint if this Stipulation is either not approved by the Commission or is not
12 timely performed by RESPONDENT. RESPONDENT fully understands that he has the right to be
13 represented by legal counsel in this matter at his own expense.
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15 4. Each party shall bear their own attorney's fees and costs, *except* as the Division's
16 Attorney's pre-hearing costs provided above.
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18 5. Approval of Stipulation. Once executed, this Stipulation will be filed with the
19 Commission and will be placed on the agenda for approval at its next public meeting. The Division will
20 recommend to the Commission approval of the Stipulation. RESPONDENT agrees that the Commission
21 may approve, reject, or suggest amendments to this Stipulation that must be accepted or rejected by
22 RESPONDENT before any amendment is effective.
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24 6. Withdrawal of Stipulation. If the Commission rejects this Stipulation or suggests
25 amendments unacceptable to RESPONDENT, RESPONDENT may withdraw from this Stipulation, and
26 the Division may pursue its Complaint before the Commission. This Stipulation then shall become null
27 and void and unenforceable in any manner against either party.

28 7. Release. In consideration of the execution of this Stipulation, RESPONDENT for himself,

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

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

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18 9. Default. In the event of default, RESPONDENT agrees that all his licenses shall be
19 immediately suspended, and the unpaid balance of the administrative fine and costs, together with any
20 attorney's fees and costs that may have been assessed, shall be due in full to the Division within ten
21 calendar days of the date of default. Debt collection actions for unpaid monetary assessments in this case
22 may be instituted by the Division or its assignee. RESPONDENT agrees that the foregoing suspension
23 of his license shall continue until the unpaid monetary assessments are paid in full.

24
25 10. RESPONDENT has signed and dated this Stipulation only after reading and
26 understanding all terms herein.

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1 DATED this 12 day of May 2023.

DATED this 12 day of May 2023.


NEVADA DEPARTMENT OF BUSINESS
& INDUSTRY, REAL ESTATE DIVISION

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5 By: 
TYLER SCOTT RICHARDSON
6 Respondent

By: 
SHARATH CHANDRA
Administrator

7
8 Approved as to form:

9 AARON D. FORD
Attorney General

10
11 By: 
CHRISTAL P. KEEGAN (Bar No. 12725)
12 Deputy Attorney General
13 5420 Kietzke Lane #202
Reno, Nevada 89511
14 *Attorney for Real Estate Division*

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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 May 2- 4, 2023, and the Commission being fully apprised of terms and good cause appearing.

IT IS ORDERED that the foregoing Stipulation and Order for Settlement of Disciplinary Action, submitted by Petitioner and Respondent, is approved in full and shall become effective immediately.

Dated: May 16, 2023.

NEVADA REAL ESTATE COMMISSION

By: David Tonia
Vice President, Nevada Real Estate Commission

AARON D. FORD
Attorney General

By: epkeegan
CHRISTAL P. KEEGAN (Bar No. 12725)
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5420 Kietzke Lane #202
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