

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. 2022-314

Petitioner,

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


7 vs.

8 PHILBERT WILSON,
9 (B.1001034.LLC, B.1002757.INDV,
10 PM.0163519.BKR)

FILED

FEB 28 2023

11 Respondent.

REAL ESTATE COMMISSION
BY 

12 This Stipulation for Settlement of Disciplinary Action (“Stipulation”) is entered into by and
13 between the State of Nevada, Department of Business and Industry, Real Estate Division (“Division”),
14 through its Administrator Sharath Chandra (“Petitioner”), by and through their attorney of record,
15 Christal Park Keegan, and Philbert Wilson (“RESPONDENT”).

16 RESPONDENT is a licensed Broker under NRS Chapter 645, licenses B.1001034.LLC,
17 B.1002757.INDV, and PM.0163519.BKR, and is therefore subject to the jurisdiction of the Division and
18 the Commission and the provisions of NRS Chapter 645 and NAC Chapter 645.

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

20 1. At all times relevant, RESPONDENT was the broker for Quantified Investment Group.
21 NRED 000004.

22 2. At all times relevant, RESPONDENT was the broker for Agent, Ajay Gerald Dayal
23 (“Dayal”), at Quantified Investment Group. NRED 000002 -NRED 000003.

24 3. On January 25, 2022, Dayal recorded frivolous claims (*lis pendens*) on two Las Vegas,
25 Nevada real estate transactions he had previously represented and/or had an interest in 3659 Bufflehead
26 Street and 4998 Philadelphia Avenue. NRED 000061 – NRED 000072, NRED 000021 – NRED 000039,
27 NRED 000041 – NRED 000059.

28 ...

1 4. On February 4, 2022, a Trustee’s Deed Upon Sale was recorded identifying that Dayal’s
2 company, Quantified Development Group, LLC, had defaulted on its Deed of Trust. NRED 000075 –
3 NRED 000078, and NRED 000079 – NRED 000082.

4 5. On February 11, 2022, the Clark County District Court denied Dayal’s lawsuits filed on
5 the Philadelphia and Bufflehead Properties. NRED 000061 – NRED 000072.

6 6. The Division’s numerous requests upon RESPONDENT to supply his statement and
7 documents (letters dated February 1, 2022, and March 18, 2022) with regards to RESPONDENT’S Agent
8 Dayal were never complied with. NRED 000005 - NRED 000016, NRED 000084.

9 **SUMMARY OF ALLEGED VIOLATIONS**

10 7. RESPONDENT violated NRS 645.633(1)(h) pursuant to NAC 645.605(11)(a) when he
11 impeded or attempted to impede any investigation of the Division by failing to comply or delay his
12 compliance with numerous requests by the Division to provide documents.

13 8. RESPONDENT violated NRS 645.633(1)(h) pursuant to NAC 645.605(11)(b) when he
14 failed to provide a written response as requested by the Division on numerous occasions.

15 **PROPOSED SETTLEMENT**

16 9. In an effort to avoid the time and expense of litigating these issues before the Commission,
17 the parties desire to compromise and settle the instant controversy upon the following terms and
18 conditions:

19 a. RESPONDENT agrees to pay the Division a total amount of \$3,211.00 (“Amount
20 Due”), consisting of a \$1,000 fine imposed by the Division, the Division’s pre-hearing costs and fees in
21 the amount of \$1,070.00, and the Attorney’s pre-hearing costs and fees in the amount of \$1,141.00.

22 b. The Amount Due shall be payable to the Division in monthly payments for a period
23 of 24 months beginning on **March 1, 2023**, and ending on **February 1, 2025**, as follows:

24	March 1, 2023	\$133.80
25	April 1, 2023	\$133.80
26	May 1, 2023	\$133.80
27	June 1, 2023	\$133.80
28	July 1, 2023	\$133.80

1	August 1, 2023	\$133.80
2	September 1, 2023	\$133.80
3	October 1, 2023	\$133.80
4	November 1, 2023	\$133.80
5	December 1, 2023	\$133.80
6	January 1, 2024	\$133.80
7	February 1, 2024	\$133.80
8	March 1, 2024	\$133.80
9	April 1, 2024	\$133.80
10	May 1, 2024	\$133.80
11	June 1, 2024	\$133.80
12	July 1, 2024	\$133.80
13	August 1, 2024	\$133.80
14	September 1, 2024	\$133.80
15	October 1, 2024	\$133.80
16	November 1, 2024	\$133.80
17	December 1, 2024	\$133.80
18	January 1, 2025	\$133.80
19	February 1, 2025	\$133.60

20 At any time, RESPONDENT may elect to pay the Amount Due in full and/or may make monthly
21 payments towards any monthly payment due, so long as the monthly amount due is satisfied in full on
22 the quarterly due date specified above.

23 c. RESPONDENT further agrees to complete six (6) hours of live, continuing
24 education in Broker management, which shall not count towards RESPONDENT's education needed for
25 his annual license renewal. RESPONDENT shall complete the education set forth herein within six (6)
26 months of the date of the order approving this Stipulation.

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1 10. RESPONDENT and the Division agree that by entering into this Stipulation, the Division
2 does not concede any defense or mitigation RESPONDENT may assert and that once this Stipulation is
3 approved and fully performed, the Division will close its file in this matter.

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

15 12. The parties hereby stipulate to the Division's exhibits, numbered NRED 000001 –
16 NRED 000082.

17 13. Each party shall bear their own attorney's fees and costs, *except* as the Division's
18 Attorney's pre-hearing costs provided above.

19 14. Approval of Stipulation. Once executed, this Stipulation will be filed with the
20 Commission and will be placed on the agenda for approval at its next public meeting. The Division will
21 recommend to the Commission approval of the Stipulation. RESPONDENT agrees that the Commission
22 may approve, reject, or suggest amendments to this Stipulation that must be accepted or rejected by
23 RESPONDENT before any amendment is effective.

24 15. 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 16. 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 17. Indemnification. RESPONDENT hereby agrees to indemnify and hold harmless the
10 State of Nevada, the Department of Business and Industry, Petitioner, the Division, and each of their
11 respective members, agents, employees, and counsel, in their individual and representative capacities,
12 against any and all claims, suits, and actions brought against said persons and/or entities by reason of the
13 Division's investigation, this disciplinary action, and all other matters relating thereto, and against any
14 and all expenses, damages, and costs, including court costs and attorney fees, which may be sustained by
15 the persons and/or entities named in this section as a result of said claims, suits, and actions.

16 18. Default. In the event of default, RESPONDENT agrees that his license shall be
17 immediately suspended, and the unpaid balance of the administrative fine and costs, together with any
18 attorney's fees and costs that may have been assessed, shall be due in full to the Division within ten
19 calendar days of the date of default. Debt collection actions for unpaid monetary assessments in this case
20 may be instituted by the Division or its assignee. RESPONDENT agrees that the foregoing suspension
21 of his license shall continue until the unpaid monetary assessments are paid in full. RESPONDENT
22 agrees that his license shall also be immediately suspended if he fails to timely attend and complete the
23 above continuing education. RESPONDENT agrees that the suspension of his license shall continue
24 until the continuing education is completed.

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

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1 DATED this 17 day of February 2023.

DATED this 28 day of February 2023.

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NEVADA DEPARTMENT OF BUSINESS
& INDUSTRY, REAL ESTATE DIVISION

By: Philbert Wilson
PHILBERT WILSON

By: [Signature]
SHARATH CHANDRA
Administrator

Approved as to form:

AARON D. FORD
Attorney General

By: epkeegan
CHRISTAL P. KEEGAN (Bar No. 12725)
Deputy Attorney General
5420 Kietzke Lane #202
Reno, Nevada 89509
(775) 687-2141
Attorneys for Real Estate Division

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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
14 February 21st, 2023, and the Commission being fully apprised of terms and good cause appearing.

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


17 This Order shall become effective on the 28th day of February, 2023

18 Dated: February 28, 2023.

19 NEVADA REAL ESTATE COMMISSION

20 By: 
21 President, Nevada Real Estate Commission

22 AARON D. FORD
23 Attorney General

24 By: 
25 CHRISTAL P. KEEGAN (Bar No. 12725)
26 Deputy Attorney General
27 5420 Kietzke Lane #202
28 Reno, Nevada 89509
(775) 687-2141
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