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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. 2022-240

Petitioner,

vs.

SCOTT C. SHANDREW,
(S.0058319)

Respondent.

STIPULATION AND ORDER 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, Christal Park Keegan, and Scott C. Shandrew (“RESPONDENT”), by and through his counsel, Dane A. Littlefield.

RESPONDENT, at all relevant times mentioned in this Complaint, was and is presently licensed as a salesperson under license number S.0058319. 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. At all times relevant to this Complaint, the RESPONDENT was associated with Dickson Realty Inc. (“Dickson Realty”) as a salesperson. *NRED 0016.*

2. On the evening of December 30, 2020, the RESPONDENT groped and/or fondled the Complainant’s breasts without her permission in his office at Dickson Realty. *NRED 0046, NRED 0036, and NRED 0007 – 0008.*

3. The Complainant reported the incident to her brokers and Reno Police. *NRED 0036.*

4. The RESPONDENT was fired from Dickson Realty. *NRED 0036, NRED 0039.*

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

RESPONDENT shall pay \$290 a month, with monthly payments to start sixty (60) days after approval of this Stipulation by the Commission, as follows:

1st Year: 12 payments at \$290/month

2nd Year: 11 payments at \$290/month

With \$267.00 to be paid on the 12th and final payment in the 2nd year for a total payment of \$6,937.00, as being the total Amount Due hereunder. At any time, RESPONDENT may elect to make pre-payments on the Amount Due with no penalties so long as the monthly amount due in the annual period is satisfied in full as specified above.

2. RESPONDENT further agrees that he shall not apply for broker-salesperson and/or broker licenses for a period of five (5) years after approval of this Stipulation.

3. RESPONDENT and the Division agree that by entering into this Stipulation, RESPONDENT does not concede the allegations of the Complaint and the Division does not concede any defense or mitigation RESPONDENT may assert, and that once this Stipulation is approved and fully performed, the Division will close its file in this matter. The Division agrees not to pursue any other or greater remedies or fines in connection with RESPONDENT’S alleged conduct referenced herein. The Division further agrees that unless RESPONDENT fails to make timely payment, the Division will not bring any claim or cause directly or indirectly based upon any of the facts, circumstances, or allegations discovered during the Division’s investigation and prosecution of this case.

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

1 timely performed by RESPONDENT. RESPONDENT fully understands that he has the right to be
2 represented by legal counsel in this matter at his own expense.

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

5 6. Approval of Stipulation. Once executed, this Stipulation will be filed with the
6 Commission and will be placed on the agenda for approval at the public meeting scheduled for November
7 7 - 9, 2023. The Division will recommend to the Commission approval of the Stipulation.
8 RESPONDENT agrees that the Commission may approve, reject, or suggest amendments to this
9 Stipulation that must be accepted or rejected by RESPONDENT before any amendment is effective.

10 7. Withdrawal of Stipulation. If the Commission rejects this Stipulation or suggests
11 amendments unacceptable to RESPONDENT, RESPONDENT may withdraw from this Stipulation, and
12 the Division may pursue its Complaint before the Commission. This Stipulation then shall become null
13 and void and unenforceable in any manner against either party.

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

23 9. Indemnification. RESPONDENT hereby agrees to indemnify and hold harmless the State
24 of Nevada, the Department of Business and Industry, Petitioner, the Division, and each of their respective
25 members, agents, employees, and counsel, in their individual and representative capacities, against any
26 and all claims, suits, and actions brought against said persons and/or entities by reason of the Division's
27 investigation, this disciplinary action, and all other matters relating thereto, and against any and all
28

1 expenses, damages, and costs, including court costs and attorney fees, which may be sustained by the
2 persons and/or entities named in this section as a result of said claims, suits, and actions.

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

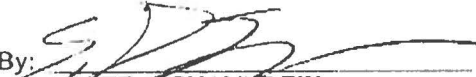
9 11. RESPONDENT has signed and dated this Stipulation only after reading and
10 understanding all terms herein.

11 DATED this 25 day of July 2023.

DATED this 26 day of July 2023.

12 NEVADA DEPARTMENT OF BUSINESS AND

INDUSTRY, REAL ESTATE DIVISION


13
14 By: 
15 SCOTT C. SHANDREW
Respondent

By: 
15 SHARATH CHANDRA
Administrator

16 Approved as to form:

Approved as to form:

17
18 By: 
19 CHRISTAL P. KEEGAN
Deputy Attorney General
20 Bar No. 12725
5420 Kietzke Lane, #202
21 Reno, Nevada 89511
(775) 687-2141
22 *Attorney for Real Estate Division*

By: 
20 DANE A. LITTLEFIELD
Bar No. 14080
21 Lemons, Grundy & Eisenberg
6005 Plumas Street, 3rd Floor
(775) 786-6868
22 *Attorney for Respondent*

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ORDER FOR SETTLEMENT OF DISCIPLINARY ACTION

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 November 7-9, 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: November ____, 2023.

NEVADA REAL ESTATE COMMISSION

By: _____
President, Nevada Real Estate Commission

AARON D. FORD
Attorney General

By: *epkeegan*
CHRISTAL P. KEEGAN (Bar No. 12725)
Deputy Attorney General
5420 Kietzke Lane, #202
Reno, Nevada 89511
(775) 687-2141

Attorney for Real Estate Division