

1 **BEFORE THE REAL ESTATE COMMISSION**
2 **STATE OF NEVADA**

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

Petitioner,

7 vs.

8 PATRICK ALLISON
(BS.0145344.MGR),

9 Respondent.

Case No. 2024-293

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

FILED

AUG 20 2024

REAL ESTATE COMMISSION

BY Kelly Valadez

10
11 This Stipulation for Settlement of Disciplinary Action (“Stipulation”) is entered into by and
12 between the State of Nevada, Department of Business and Industry, Real Estate Division (“Division”),
13 through its Administrator Sharath Chandra (“Petitioner”), by and through their attorney of record,
14 Christal Park Keegan, and Patrick Allison (“RESPONDENT”).

15 RESPONDENT, at all relevant times mentioned in this Complaint, was actively licensed as a
16 broker salesperson under license number BS.0145344.MGR. RESPONDENT is, therefore, subject to
17 the jurisdiction of the Division and the Commission, and the provisions of NRS chapter 645 and
18 NAC chapter 645.

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

20 1. At all times relevant to the Complaint, RESPONDENT was the Branch Manager for eXp
21 Realty. *NRED 000004.*

22 2. At all times relevant, Anna Maria Rozalska, respondent in another case no. 2024-83,
23 joined RESPONDENT’S team. *NRED 000057.*

24 3. On or about June 30, 2023, RESPONDENT’S real estate licensee Ms. Rozalska’s license
25 expired. *NRED 000003.*

26 4. Yet, on or about July 8, 2023, the RESPONDENT’S expired licensee Ms. Rozalska was
27 indicated on a signed Duties Owed By A Nevada Real Estate Licensee (“Duties Owed”). *NRED 000086.*
28

1 1. RESPONDENT agrees to pay the Division a total amount of \$9,124.40 (“Amount Due”),
2 consisting of \$4,806 of commissions benefited, a \$3,000.00 fine imposed by the Division, the Division’s
3 pre-hearing costs and fees in the amount of \$533.20, and the Attorney’s pre-hearing costs and fees in the
4 amount of \$785.20, payable to the Division in full within thirty (30) days after approval of this Stipulation
5 by the Commission.

6 2. RESPONDENT further agrees to complete a total of six (6) hours of live, continuing
7 education in the relevant areas of Broker Management, which shall not be counted towards his license
8 renewal requirements. RESPONDENT shall complete the education set forth herein within 120 days
9 from the date of the Order approving this Stipulation.

10 3. RESPONDENT and the Division agree that by entering into this Stipulation, the Division
11 does not concede any defense or mitigation RESPONDENT may assert and that, once this Stipulation is
12 approved and fully performed, the Division will close its files in these matters, provided that, if any
13 further violations are discovered in these matters beyond the scope of facts and violations already pled
14 in the Complaints, the Division is not barred from further reviewing any of the same to determine if any
15 such further violations not already covered in the Complaints have taken place and should subject
16 RESPONDENT to further disciplinary action.

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

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

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

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

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

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


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

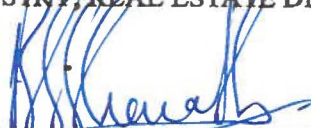
7 11. RESPONDENT has signed and dated this Stipulation only after reading and
8 understanding all terms herein.

9
10 DATED this 31 day of July, 2024.

DATED this 5 day of August, 2024.

NEVADA DEPARTMENT OF BUSINESS
AND INDUSTRY, REAL ESTATE DIVISION

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12
13
14 By: 
15 PATRICK ALLISON
16 Respondent


By: 
SHARATH CHANDRA
Administrator


17 Approved as to form:

Approved as to form:

18 AARON D. FORD
19 Attorney General

LEWIS BRISBOIS BISGAARD & SMITH

20 By: 
21 CHRISTAL P. KEEGAN (Bar No. 12725)
22 Deputy Attorney General
23 5420 Kietzke Lane #202
24 Reno, Nevada 89511

By: 
JESSICA L. BEELER
(Bar. No. 19387)
6385 S Rainbow Blvd, Suite 600
Las Vegas, Nevada 89118

Attorney for Real Estate Division

Attorney for eXp Realty

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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 August 13-15, 2024, 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: August 20, 2024.

NEVADA REAL ESTATE COMMISSION

By: [Signature]
President, Nevada Real Estate Commission

AARON D. FORD
Attorney General

By: [Signature]
CHRISTAL P. KEEGAN (Bar No. 12725)
Deputy Attorney General
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(775) 687-2141

Attorney for Real Estate Division