

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,

6 Petitioner,

7 vs.

8 KAYVOUGHN MORADI,
9 (B.0144876.LLC, PM.0166664.BKR)

10 Respondent.

Case No. 2024-350

FILED

NOV 21 2024

REAL ESTATE COMMISSION

BY Kelly Valadez

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

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

17 RESPONDENT is actively licensed as a Broker B.0144876.LLC. RESPONDENT is, therefore,
18 subject to the jurisdiction of the Division and the Commission, and the provisions of NRS Chapter 645
19 and NAC Chapter 645.

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

- 21 1. RESPONDENT’S broker’s license was first issued in April of 2018. NRED 000003.
22 2. On or about April 15, 2022, as a courtesy, the Division informed the RESPONDENT of
23 his requirement as a Broker to submit his 546 or 546A Form. NRED 000004.
24 3. Shortly thereafter, on or about April 18, 2022, the RESPONDENT submitted his tardy
25 Form 546A to the Division. NRED 000005.
26 4. But in 2024, the RESPONDENT failed to submit his Form 546A to the Division.
27 NRED 000007 – NRED 000011.

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1 a. The Amount Due shall be payable to the Division in full within thirty (30) days
2 after approval of this Stipulation by the Commission.

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

6 4. The Division agrees not to pursue any other or greater remedies or fines in connection
7 with RESPONDENT'S alleged conduct referenced herein. The Division further agrees that unless
8 RESPONDENT fails to make timely payment, the Division will not bring any claim or cause directly or
9 indirectly based upon any of the facts, circumstances, or allegations discovered during the Division's
10 investigation and prosecution of this case.

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

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

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

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

5 9. Stipulation is Not Evidence. If the Commission rejects this Stipulation or suggests
6 amendments unacceptable to RESPONDENT, RESPONDENT may withdraw from this Stipulation, and
7 the Division may pursue its Complaint before the Commission.

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

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

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

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4 13. RESPONDENT has signed and dated this Stipulation only after reading and
5 understanding all terms herein.

6 DATED this 21 day of October 2024.

DATED this 22 day of October 2024.

7 NEVADA DEPARTMENT OF BUSINESS
8 AND INDUSTRY, REAL ESTATE DIVISION

9 By: Kayvoughn Moradi
10 KAYVOUGHN MORADI
Respondent

By: Sharath Chandra
SHARATH CHANDRA
Administrator

11
12 Approved as to form:

13 AARON D. FORD
14 Attorney General

15 By: epkeegan
16 CHRISTAL P. KEEGAN (Bar No. 12725)
17 Deputy Attorney General
5420 Kietzke Lane, Suite 202
18 Reno, Nevada 89511
(775) 687-2141

19 *Attorney for Real Estate Division*
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REAL ESTATE COMMISSION

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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 19-21, 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: November 21, 2024.

NEVADA REAL ESTATE COMMISSION

By: Aaron D. Ford
President, Nevada Real Estate Commission

AARON D. FORD
Attorney General

By: epkeegan
CHRISTAL P. KEEGAN (Bar No. 12725)
Deputy Attorney General

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5420 Kietzke Lane, Suite 202
Reno, Nevada 89511
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Attorney for Real Estate Division