1	BEFORE THE REAL ESTATE COMMISSION		
2	STATE OF NEVADA		
3 4	SHARATH CHANDRA, Administrator, REAL ESTATE DIVISION, DEPARTMENT OF BUSINESS AND INDUSTRY,	Case No. 2024-350	
5	STATE OF NEVADA,	77777	
6	Petitioner,	话们们有问	
7	VS.	NOV 2 1 2024	
8	KAYVOUGHN MORADI,	REAL ESTATE COMMISSION BY Kelly Valader	
9	(B.0144876.LLC, PM.0166664.BKR)	0	
10	Respondent.		
11	10000 1000000	1	
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 c	ourtesy, 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 Ap	ril 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.		
28			
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Therefore, on or about April 15, 2024, the Division sent a Notice of Violation letter to the 5. 1 RESPONDENT'S last known brokerage address on record requesting the required Form 546A and 2 payment of the administrative fine of \$250 due by May 15, 2024. NRED 000006, and 3 4 NRED 000007 - NRED 000011. On or about June 3, 2024, the Division also emailed RESPONDENT informing him his 5 6. 546A Form and fine payment of \$250 were past due. NRED 000013 - NRED 000014. 6 On or about June 11, 2024, the Division informed the RESPONDENT it would proceed 7 7. formally due to his failure to remit the form or the fine. NRED 000012. 8 9 8. On or about June 11th and the 20th of 2024, the Division received proof its letter was delivered. NRED 000015 - NRED 000016. 10 SUMMARY OF ALLEGED VIOLATIONS 11 RESPONDENT violated NRS 645.633(1)(b) pursuant to NAC 645.806(3) for failing to 12 1. submit his Form 546A by the last day of his real estate license expiration month. 13 RESPONDENT violated NRS 645.633(1)(b) pursuant to NAC 645.695 for failing 14 2. to pay the \$250 administrative fine levied by the Division for failure to timely submit the 2024 15 16 Form 546A Affidavit. 17 **PROPOSED SETTLEMENT** In an effort to avoid the time and expense of litigating these issues before the Commission, the 18 RESPONDENT does not contest the violations alleged, and the parties desire to compromise and settle 19 20 the instant controversy upon the following terms and conditions: RESPONDENT agrees to complete and submit the delinquent 546A Form for the year 21 1. 22 2024 to the Division. 23 2. RESPONDENT agrees to pay the Division a total amount of One Thousand Two Hundred 24 Thirty-Eight and 16/100 (\$1,238.16) ("Amount Due"), consisting of Two Hundred Fifty Dollars 25 (\$250.00) fine imposed by the Division, the Division's pre-hearing costs and fees in the amount of Three 26 Hundred Sixty Dollars (\$360.00), and the Attorney's pre-hearing costs and fees in the amount of Six 27 Hundred Twenty-Eight and 16/100 (\$628.16) payable to the Division in full upon approval of this 28 Stipulation by the Commission.

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

3. RESPONDENT and the Division agree that by entering into this Stipulation, 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.

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4. 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.

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

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

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

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

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

8 Release. In consideration of the execution of this Stipulation, RESPONDENT for himself, 10. 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.

12. Default. In the event of default, RESPONDENT agrees that all his licenses shall
be immediately suspended, and the unpaid balance of the administrative fine and costs, together with
any attorney's fees and costs that may have been assessed, shall be due in full to the Division within
ten (10) calendar days of the date of default. Debt collection actions for unpaid monetary assessments in

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.	
3	•••	
4	13. RESPONDENT has signed and dated this Stipulation only after reading and	
5	understanding all terms herein.	
6	DATED this <u>21</u> day of October 2024. DATED this <u>22</u> day of October 2024.	
7	NEVADA DEPARTMENT OF BUSINESS AND INDUSTRY, BEAL ESTATE DIVISION	
8		
9	By: KAYVOUGHN MORADI By: SHARATH CHANDRA	
10	Respondent Administrator	
11		
12	Approved as to form:	
13	AARON D. FORD Attorney General	
14		
15	By: CHRISTAL &. KEEGAN (Bar No. 12725)	
16	Deputy Attorney General 5420 Kietzke Lane, Suite 202	
17	Reno, Nevada 89511 (775) 687-2141	
18	Attorney for Real Estate Division	
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11	KAYVOUGHN MORADI, (B.0144876.LLC, PM.0166664.BKR)	REAL ESTATE COMMISSION BY Kelly Valader	
12	(B.01448/0.LLC, PM.0100004.BKK)	By nearly rations of	
13	Respondent.		
14			
15	ORDER FOR SETTLEMENT OF DISCIPLINARY ACTION		
16	The Stipulation for Settlement of Disciplinary Action having come before the Real Estate		
17	Commission, Department of Business and Industry, State of Nevada, during its regular agenda on		
18	November 19-21, 2024, and the Commission being fully apprised of terms and good cause appearing.		
19	IT IS ORDERED that the foregoing Stipulation and Order for Settlement of Disciplinary Action,		
20	submitted by Petitioner and Respondent, is approved in full and shall become effective immediately.		
21	Dated: November 21, 2024.		
22	NEVADA REAL ESTATE COMMISSION		
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24	By: President, Nevada Real Estàte Commission		
25		Teshtein, Hevala Real Estate Commission	
26	AARON D. FORD Attorney General		
27	- 4		
28	By: <u>CHRISTAL P. KEEGAN (Bar No. 12725)</u> Deputy Attorney General		
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1	5420 Kietzke Lane, Suite 202 Reno, Nevada 89511 (775) 687-2141 Attorney for Real Estate Division
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