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

SHARATH CHANDRA, Administrator,  
REAL ESTATE DIVISION, DEPARTMENT  
OF BUSINESS AND INDUSTRY,  
STATE OF NEVADA,

Petitioner,

vs.

BRETT W. O'KEEFE,  
(B.1002390.INDV)

Respondent.

Case No. 2024-215

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

**FILED**

AUG 20 2024

REAL ESTATE COMMISSION

BY Kelley Valadez

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 Brett W. O'Keefe ("RESPONDENT").

RESPONDENT is actively licensed as a Broker (B.1002390.INDV). 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. RESPONDENT'S broker's license was first issued in January of 2020. *NRED 000003.*
2. But in 2022, the RESPONDENT failed to timely submit his Form 546A to the Division. *NRED 000004.*
3. Therefore, on or about February 25, 2022, as a courtesy, the Division informed the RESPONDENT it would not issue an administrative fine if he just submitted his form. *NRED 000004.*
4. In response, on that same day, the Division received RESPONDENT'S tardy Form 546A. *NRED 000005.*
5. On or about December 30, 2022, RESPONDENT submitted his Form 546A for January 2023. *NRED 000005.*

1           6.     But in 2024, the RESPONDENT failed to submit his Form 546A to the Division.  
2 *NRED 000006 – NRED 000007.*

3           7.     Therefore, on or about March 12, 2024, the Division sent a Notice of Violation letter to  
4 the RESPONDENT's Nevada brokerage address requesting the required Form 546A and payment of the  
5 administrative fine of \$250 due by April 11, 2024. *NRED 000006 – NRED 000007.*

6           8.     On or about March 12, 2024, the Division had also sent a Notice of Violation letter to  
7 RESPONDENT'S California brokerage address. *NRED 000011 – NRED 000013.*

8           9.     On or about April 23, 2024, the Division emailed RESPONDENT informing him his 546A  
9 Form and fine payment of \$250 were past due.

10          10.     On or about April 25, 2024, the Notice of Violation Letter sent to his Nevada brokerage  
11 address was returned to the Division marked Unknown. *NRED 000014.*

12          11.     On or about May 6, 2024, the Division informed the RESPONDENT it would proceed  
13 formally due to his failure to remit the form or the fine. *NRED 000017.*

14          12.     On or about May 9, 2024, the Division's letter was refused. *NRED 000020.*

15   **SUMMARY OF ALLEGED VIOLATIONS**

16          1.     Pursuant to NRS 645.633(1)(b), RESPONDENT violated NAC 645.806(3) for failing to  
17 submit his Form 546A by the last day of his real estate license expiration month.

18   **PROPOSED SETTLEMENT**

19           In an effort to avoid the time and expense of litigating these issues before the Commission, the  
20 RESPONDENT does not contest the violations alleged, and the parties desire to compromise and settle  
21 the instant controversy upon the following terms and conditions:

22          1.     RESPONDENT agrees to pay the Division a total amount of \$1,238.16 ("Amount Due"),  
23 consisting of a \$250.00 fine imposed by the Division, the Division's pre-hearing costs and fees in the  
24 amount of \$360, and the Attorney's pre-hearing costs and fees in the amount of \$628.16 payable to the  
25 Division in full upon approval of this Stipulation by the Commission.

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

*3 June*

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

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

17           5.     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           6.     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           7.     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

1           8.     Stipulation is Not Evidence. 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.

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

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

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

26 ...  
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28 ...




1 12. RESPONDENT has signed and dated this Stipulation only after reading and  
2 understanding all terms herein.

3 DATED this 13 day of July 2024.

DATED this 15 day of July 2024.

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5  
6 By:   
7 BRETT W. O'KEEFE  
8 Respondent

NEVADA DEPARTMENT OF BUSINESS  
AND INDUSTRY, REAL ESTATE DIVISION  
By:   
SHARATH CHANDRA  
Administrator

9 Approved as to form:

10 AARON D. FORD  
11 Attorney General

12 By:   
13 CHRISTAL P. KEEGAN (Bar No. 12725)  
14 Deputy Attorney General  
15 5420 Kietzke Lane, Suite 202  
16 Reno, Nevada 89511  
17 (775) 687-2141  
18 Attorney for Real Estate Division  
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AUG 20 2024

REAL ESTATE COMMISSION

BY Keely Valadery

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: Gene Ripburn  
President, Nevada Real Estate Commission

AARON D. FORD  
Attorney General

By: epkegan  
CHRISTAL P. KEEGAN (Bar No. 12725)  
Deputy Attorney General  
5420 Kietzke Lane, Suite 202  
Reno, Nevada 89511  
(775) 687-2141  
*Attorney for Real Estate Division*