

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,

7 Petitioner,

8 vs.

9 MICHELLE A. STEWART,  
10 (B.0033239.LLC)

11 Respondent.

Case No. 2024-497

**FILED**

NOV 21 2024

REAL ESTATE COMMISSION

BY Kelley Valadez

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 Michelle A. Stewart ("RESPONDENT").

17 RESPONDENT is actively licensed as a Broker (B.0033239.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 2020 with an expiration month  
22 of April. NRED 000003.

23 2. On or about May 12, 2022, as a courtesy, the Division informed the RESPONDENT of  
24 her requirement as a Broker to submit her 546 or 546A Form. NRED 000005.

25 3. On or about May 26, 2022, the Division sent a letter to the RESPONDENT informing her  
26 of the requirement as a broker to submit the Form 546 or 546A. NRED 000006.

27 4. Over a month later, on or about June 15, 2022, the RESPONDENT submitted her tardy  
28 Form 546A to the Division. NRED 000004.



1           1.     RESPONDENT agrees to complete and submit the delinquent 546A Form for the  
2 year 2024 to the Division.

3           2.     RESPONDENT agrees to pay the Division a total amount of One Thousand Two Hundred  
4 Thirty-Eight Dollars and 36/100 (\$1,238.16) (“Amount Due”), consisting of a Two Hundred Fifty Dollars  
5 (\$250.00) fine imposed by the Division, the Division’s pre-hearing costs and fees in the amount of Three  
6 Hundred Sixty Dollars (\$360.00), and the Attorney’s pre-hearing costs and fees in the amount of Six  
7 Hundred Twenty-Eight Dollars and 16/100 (\$628.16) payable to the Division in full upon approval of  
8 this Stipulation by the Commission.

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

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

17          5.     RESPONDENT agrees and understands that by entering into this Stipulation,  
18 RESPONDENT is waiving her right to a hearing at which RESPONDENT may present evidence in her  
19 defense, her right to a written decision on the merits of the complaint, her 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 she has the right to be  
27 represented by legal counsel in this matter at her own expense.

28     ...

1           6. 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           7. 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           8. 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           9. Stipulation is Not Evidence. If the Commission rejects this Stipulation or suggests  
13 amendments unacceptable to RESPONDENT, RESPONDENT may withdraw from this Stipulation, and  
14 the Division may pursue its Complaint before the Commission.

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

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

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 12. Default. In the event of default, RESPONDENT agrees that all her 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  
6 ten (10) calendar days of the date of default. Debt collection actions for unpaid monetary assessments in  
7 this case may be instituted by the Division or its assignee. RESPONDENT agrees that the foregoing  
8 suspension of her license shall continue until the unpaid monetary assessments are paid in full.

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

11 DATED this 1<sup>st</sup> day of Nov 2024.

DATED this 4 day of November 2024.

NEVADA DEPARTMENT OF BUSINESS  
AND INDUSTRY, REAL ESTATE DIVISION

12  
13  
14 By: Michelle Stewart  
15 MICHELLE A. STEWART  
16 Respondent

By: Sharath Chandra  
SHARATH CHANDRA  
Administrator

17 Approved as to form:

18 AARON D. FORD  
19 Attorney General

20 By: epkeegan  
21 CHRISTAL P. KEEGAN (Bar No. 12725)  
22 Deputy Attorney General  
23 5420 Kietzke Lane, Suite 202  
24 Reno, Nevada 89511  
25 (775) 687-2141

*Attorney for Real Estate Division*

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REAL ESTATE COMMISSION

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13 The Stipulation for Settlement of Disciplinary Action having come before the Real Estate  
14 Commission, Department of Business and Industry, State of Nevada, during its regular agenda on  
15 November 19-21, 2024, and the Commission being fully apprised of terms and good cause appearing.


16 IT IS ORDERED that the foregoing Stipulation and Order for Settlement of Disciplinary Action,  
17 submitted by Petitioner and Respondent, is approved in full and shall become effective immediately.

18 Dated: November 21, 2024.

19 NEVADA REAL ESTATE COMMISSION

20 By:   
President, Nevada Real Estate Commission

21 AARON D. FORD  
22 Attorney General

23 By:   
24 CHRISTAL P. KEEGAN (Bar No. 12725)  
25 Deputy Attorney General  
26 5420 Kietzke Lane, #202  
27 Reno, Nevada 89511  
28 (775) 687-2141  
*Attorney for Real Estate Division*