

BEFORE THE REAL ESTATE COMMISSION
STATE OF NEVADA

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

Petitioner,

vs.

CLAUDIA L. TOWNSEND,
(B.1002345.INDV)

Respondent.

Case No. 2023-899

STIPULATION AND ORDER FOR
SETTLEMENT OF DISCIPLINARY
ACTION

FILED

MAY 28 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 Claudia L. Townsend (“RESPONDENT”).

RESPONDENT is actively licensed as a Broker (B.1002345.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 September of 2019. *NRED 003.*
2. On or about September 29, 2020, RESPONDENT timely submitted her Form 546A mandatory broker annual reporting prior to the expiration month of her broker’s license (September 30, 2020). *NRED 005.*
3. But in 2021, the RESPONDENT failed to timely submit her Form 546A to the Division. *NRED 005.*
4. Therefore, on or about October 25, 2021, as a courtesy, the Division informed the RESPONDENT it would not issue an administrative fine if she just submitted her form. *NRED 004.*

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

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

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

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

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

27 7. Withdrawal of Stipulation. If the Commission rejects this Stipulation or suggests
28 amendments unacceptable to RESPONDENT, RESPONDENT may withdraw from this Stipulation, and

1 the Division may pursue its Complaint before the Commission. This Stipulation then shall become null
2 and void and unenforceable in any manner against either party.

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

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

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

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

28

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

3 DATED this 19th day of April 2024.

DATED this 22 day of April 2024.

NEVADA DEPARTMENT OF BUSINESS
AND INDUSTRY, REAL ESTATE DIVISION

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5 Authentisign
6 By: Claudia L. Townsend 04/19/24
7 CLAUDIA L. TOWNSEND
8 Respondent

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, #202
16 Reno, Nevada 89511
17 (775) 687-2141
18 Attorney for Real Estate Division

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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 May 14-16, 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: May 28, 2024.

NEVADA REAL ESTATE COMMISSION

By: 
President, Nevada Real Estate Commission

AARON D. FORD
Attorney General

By: 
CHRISTAL P. KEEGAN (Bar No. 12725)
Deputy Attorney General
5420 Kietzke Lane, #202
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(775) 687-2141
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