1	BEFORE THE REAL ESTATE COMMISSION		
2	STATE OF NEVADA		
3	SHARATH CHANDRA, Administrator, REAL ESTATE DIVISION, DEPARTMENT	Case No. 2023-899	
4	OF BUSINESS AND INDUSTRY, STATE OF NEVADA,	Case INO. 2023-699	
5	Petitioner,	STIPULATION AND ORDER FOR SETTLEMENT OF DISCIPLINARY	
6	VS.	ACTION	
7	CLAUDIA L. TOWNSEND, (B.1002345.INDV)		
9	Respondent.		
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11	This Stipulation for Settlement of Disciplinary Action ("Stipulation") is entered into by and		
12	between the State of Nevada, Department of Business and Industry, Real Estate Division ("Division"),		
13	through its Administrator Sharath Chandra ("Petitioner"), by and through their attorney of record,		
14	Christal Park Keegan, and Claudia L. Townsend ("RESPONDENT").		
15	RESPONDENT is actively licensed as a Broker (B.1002345.INDV). RESPONDENT is,		
16	therefore, subject to the jurisdiction of the Division and the Commission, and the provisions of NRS		
17	Chapter 645 and NAC Chapter 645.		
18	SUMMARY OF FACTUAL ALLEGATIONS SET FORTH IN THE COMPLAINT		
19	1. RESPONDENT'S broker's license	e was first issued in September of 2019. NRED 003.	
20	2. On or about September 29, 2020, RESPONDENT timely submitted her Form 546A		
21	mandatory broker annual reporting prior to the expiration month of her broker's license (September 30,		
22	2020). NRED 005.		
23	3. But in 2021, the RESPONDENT failed to timely submit her Form 546A to the Division.		
24	NRED 005.		
25	4. Therefore, on or about October 25, 2021, as a courtesy, the Division informed the		
26	RESPONDENT it would not issue an administrative fine if she just submitted her form.		
27	NRED 004.		
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5. In response, on October 27, 2021, the Division received RESPONDENT'S tardy Form
 546A. NRED 005.

3 6. On or about September 30, 2022, RESPONDENT timely submitted her Form 546A.
4 *NRED 005*.

5 7. But in 2023, the RESPONDENT again failed to timely submit her mandatory broker
6 annual reporting to the Division. *NRED 005*.

7 8. Therefore, on or about October 26, 2023, the Division sanctioned the RESPONDENT
8 for her repeated failure to submit her Form 546A and issued an administrative fine of \$250 due by
9 November 27, 2023. NRED 007 - 008.

9. In response, on or about November 15, 2023, the Division received only
RESPONDENT'S tardy Form 546A, but not the \$250 administrative fine due. *NRED 005*.

12 10. Therefore, on or about December 14, 2023, the Division informed the RESPONDENT
13 she still had not remitted payment for the fine. *NRED 009*.

14 11. Accordingly, in a letter dated January 10, 2024, the RESPONDENT was informed the
15 Division would proceed formally due to her nonpayment of the \$250 administrative fine. *NRED 011*.

16 12. On or about January 17, 2024, the Division's letter was attempted delivery with notice left
17 to the RESPONDENT. *NRED 012*.

SUMMARY OF ALLEGED VIOLATIONS

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

PROPOSED SETTLEMENT

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

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

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.

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The Division agrees not to pursue any other or greater remedies or fines in connection 3. 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.

9 RESPONDENT agrees and understands that by entering into this Stipulation, 4. 10 RESPONDENT is waiving her right to a hearing at which RESPONDENT may present evidence in her defense, her right to a written decision on the merits of the complaint, her rights to reconsideration and/or 11 rehearing, appeal and/or judicial review, and all other rights which may be accorded by the Nevada 12 Administrative Procedure Act, the Nevada Real Estate Brokers and Salespersons statutes and 13 accompanying regulations, and the federal and state Constitutions. RESPONDENT understands that this 14 Agreement and other documentation may be subject to public records laws. The Commission members 15 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 timely performed by RESPONDENT. RESPONDENT fully understands that she has the right to be 18 19 represented by legal counsel in this matter at her own expense.

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

6. Approval of Stipulation. Once executed, this Stipulation will be filed with the 22 23 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 24 25 may approve, reject, or suggest amendments to this Stipulation that must be accepted or rejected by **RESPONDENT** before any amendment is effective. 26

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

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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 amendments unacceptable to RESPONDENT, RESPONDENT may withdraw from this Stipulation, and 4 5 the Division may pursue its Complaint before the Commission.

9. Release. In consideration of the execution of this Stipulation, RESPONDENT for herself, her heirs, executors, administrators, successors, and assigns, hereby releases, remises, and forever discharges the State of Nevada, the Department of Business and Industry, and the Division, and each of their respective members, agents, employees, and counsel in their individual and representative capacities, from any and all manner of actions, causes of action, suits, debts, judgments, executions, claims, and demands whatsoever, known and unknown, in law or equity, that RESPONDENT ever had, 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 matters related thereto.

Indemnification. RESPONDENT hereby agrees to indemnify and hold harmless the State 15 10. 16 of Nevada, the Department of Business and Industry, Petitioner, the Division, and each of their respective members, agents, employees, and counsel, in their individual and representative capacities, against any 17 and all claims, suits, and actions brought against said persons and/or entities by reason of the Division's 18 19 investigation, this disciplinary action, and all other matters relating thereto, and against any and all expenses, damages, and costs, including court costs and attorney fees, which may be sustained by the 20 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 may be instituted by the Division or its assignee. RESPONDENT agrees that the foregoing suspension 26 27 of her license shall continue until the unpaid monetary assessments are paid in full.

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RESPONDENT has signed and dated this Stipulation only after reading and 1 12. 2 understanding all terms herein. DATED this <u>19th</u> day of April 2024. DATED this 2^{2} day of April 2024. 3 4 NEVADA DEPARTMENT OF BUSINESS AND INDUSTRY, REAL ESTATE DIVISION 5 Authentision Claudia & Townsend 04/19/24 6 By: By: CLAUDIA L. TOWNSEND SHARATH CHANDRA 7 Respondent Administrator 8 9 Approved as to form: 10 AARON D. FORD Attorney General 11 12 By: CHRISTAL F. KEEGAN (Bar No. 12725) 13 Deputy Attorney General 5420 Kietzke Lane, #202 14 Reno, Nevada 89511 (775) 687-2141 15 Attorney for Real Estate Division 16 17 18 19 20 21 22 23 24 25 26 27 28 Page 5 of 6

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6	vs.		
7	CLAUDIA L. TOWNSEND, (B.1002345.INDV)		
8	Respondent.		
9			
10	The Stipulation for Settlement of Disciplinary Action having come before the Real Estate		
11	Commission, Department of Business and Industry, State of Nevada, during its regular agenda on		
12	May 14-16, 2024, and the Commission being fully apprised of terms and good cause appearing.		
13	IT IS ORDERED that the foregoing Stipulation and Order for Settlement of Disciplinary Action,		
14	submitted by Petitioner and Respondent, is approved in full and shall become effective immediately.		
15	Dated: May, 2024.		
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17	NEV.	ADA REAL ESTATE COMMISSION	
18	By:		
19		resident, Nevada Real Estate Commission	
20	AARON D. FORD Attorney General		
21	epkeegan		
22	By: CHRISTAL P. KEEGAN (Bar No. 12725)		
23	Deputy Attorney General 5420 Kietzke Lane, #202		
24	Reno, Nevada 89511 (775) 687-2141		
25	Attorney for Real Estate Division		
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