

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

11 Respondent.

Case No. 2023-899

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

12 This Stipulation for Settlement of Disciplinary Action (“Stipulation”) is entered into by and  
13 between the State of Nevada, Department of Business and Industry, Real Estate Division (“Division”),  
14 through its Administrator Sharath Chandra (“Petitioner”), by and through their attorney of record,  
15 Christal Park Keegan, and Claudia L. Townsend (“RESPONDENT”).

16 RESPONDENT is actively licensed as a Broker (B.1002345.INDV). RESPONDENT is,  
17 therefore, subject to the jurisdiction of the Division and the Commission, and the provisions of NRS  
18 Chapter 645 and NAC Chapter 645.

**SUMMARY OF FACTUAL ALLEGATIONS SET FORTH IN THE COMPLAINT**

- 19 1. RESPONDENT’S broker’s license 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.*



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 19<sup>th</sup> day of April 2024.

          DATED this 22 day of April 2024.

          NEVADA DEPARTMENT OF BUSINESS  
          AND INDUSTRY, REAL ESTATE DIVISION

4  
5           Authentisign  
6   By: Claudia L. Townsend           04/19/24  
7           CLAUDIA L. TOWNSEND  
          Respondent

          By:   
          SHARATH CHANDRA  
          Administrator

8  
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  
          Reno, Nevada 89511  
          (775) 687-2141  
          Attorney for Real Estate Division

**BEFORE THE REAL ESTATE COMMISSION**

**STATE OF NEVADA**

SHARATH CHANDRA, Administrator,  
REAL ESTATE DIVISION, DEPARTMENT  
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Petitioner,

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DISCIPLINARY ACTION**

vs.

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

Respondent.

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 \_\_\_\_, 2024.

NEVADA REAL ESTATE COMMISSION

By: \_\_\_\_\_  
President, Nevada Real Estate Commission

AARON D. FORD  
Attorney General

By: *epkeegan*  
CHRISTAL P. KEEGAN (Bar No. 12725)  
Deputy Attorney General  
5420 Kietzke Lane, #202  
Reno, Nevada 89511  
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*Attorney for Real Estate Division*