

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Case No. 2024-236

FILED

FEB 19 2025

REAL ESTATE COMMISSION

BY Kelley Valadez

Petitioner,

vs.

LINDA ABRAMS,
B.0037670.INDV,

Respondent.

STIPULATION AND ORDER FOR SETTLEMENT OF DISCIPLINARY ACTION

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, Phil W. Su, Esq., and LINDA ABRAMS, (“RESPONDENT”).

RESPONDENT was at all relevant times mentioned in this Complaint licensed as a Broker under license number B.0037670.INDV and 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

AS SET FORTH IN COMPLAINT

1. At all times relevant to this Complaint, RESPONDENT has been broker of record of ABL Real Estate and Property Management. [NRED0001-0005]
2. RESPONDENT’S broker’s license was first issued in 2001. [NRED0002]
3. In 2022, RESPONDENT failed to submit her mandatory 546A Affidavit form by the expiration month of her broker’s license (January 31, 2022). [NRED0003-0005]
4. On February 28, 2022, the Division sent a courtesy email to RESPONDENT reminding her of her obligation to annually submit a Trust Account Reconciliation form 546 or 546A and reminding RESPONDENT of the annual deadline for submitting these. [NRED0004]

1 **PROPOSED SETTLEMENT**

2 By entering into this Stipulation, the RESPONDENT does not admit the above factual allegations
3 but agrees to waive her right to contest the above alleged violations if the Stipulation is approved by the
4 Commission. Accordingly, in an effort to avoid the time and expense of litigating these issues before the
5 Commission, as well as any possible further legal appeals from any such decision, the parties desire to
6 compromise and settle the instant controversy upon the following terms and conditions:

7 1. RESPONDENT agrees to pay the Division a total amount of \$2,180.40 (“Amount Due”),
8 consisting of the \$250.00 administrative fine imposed by the Division, the Division’s pre-hearing costs
9 and fees in the amount of \$360.00, and pre-hearing attorney’s fees in the amount of \$1,570.40.

10 a. The Amount Due shall be payable to the Division within 90 days of the effective
11 date of this Order.

12 b. No grace period is permitted. If the payment is not actually received by the
13 Division on or before its due date, it shall be construed as an event of default by
14 Respondent.

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

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

23 4. RESPONDENT agrees and understands that by entering into this Stipulation
24 RESPONDENT is waiving her right to a hearing at which RESPONDENT may present evidence in her
25 defense, her right to a written decision on the merits of the complaint, her rights to reconsideration and/or
26 rehearing, appeal and/or judicial review, and all other rights which may be accorded by the Nevada
27 Administrative Procedure Act, the Nevada Real Estate Brokers and Salespersons statutes and
28 accompanying regulations, and the federal and state Constitutions. RESPONDENT understands that this

1 Agreement and other documentation may be subject to public records laws. The Commission members
2 who review this matter for approval of this Stipulation may be the same members who ultimately hear,
3 consider, and decide the Complaint if this Stipulation is either not approved by the Commission or is not
4 timely performed by RESPONDENT. RESPONDENT fully understands that she has the right to be
5 represented by legal counsel in this matter at her own expense.

6 5. RESPONDENT shall bear her own attorney's fees and costs.

7 6. Approval of Stipulation. Once executed, this Stipulation will be filed with the
8 Commission and will be placed on the agenda for approval at its next public meeting. The Division will
9 recommend to the Commission approval of the Stipulation. RESPONDENT agrees that the Commission
10 may approve, reject, or suggest amendments to this Stipulation that must be accepted or rejected by
11 RESPONDENT before any amendment may be considered effective.

12 7. Withdrawal of Stipulation. 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 8. Stipulation is Not Evidence. Neither this Stipulation nor any statements made concerning
16 this Stipulation may be discussed or introduced into evidence at any hearing on the Complaint, if the
17 Division must ultimately present its case based on the Complaint filed in this matter.

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

27 10. Indemnification. RESPONDENT hereby agrees to indemnify and hold harmless the State
28 of Nevada, the Department of Business and Industry, Petitioner, the Division, and each of their respective

1 members, agents, employees, and counsel, in their individual and representative capacities, against any
2 and all claims, suits, and actions brought against said persons and/or entities by reason of the Division's
3 investigation, this disciplinary action, and all other matters relating thereto, and against any and all
4 expenses, damages, and costs, including court costs and attorney fees, which may be sustained by the
5 persons and/or entities named in this section as a result of said claims, suits, and actions.


6 11. Default. In the event of default, RESPONDENT agrees that all of her active licenses,
7 permits and certificates issued by the Division shall be immediately suspended, and the unpaid balance
8 of the administrative fine and costs, together with any attorney's fees and costs that may have been
9 assessed, shall be due in full to the Division within ten calendar days of the date of default. Debt
10 collection actions for unpaid monetary assessments in this case may be instituted by the Division or its
11 assignee. RESPONDENT agrees that the foregoing suspensions shall continue until the unpaid monetary
12 assessments are paid in full.

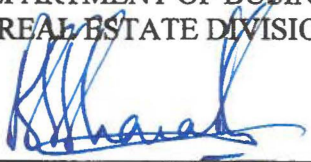
13 12. RESPONDENT confirms that she has signed and dated this Stipulation only after reading
14 and fully understanding all terms herein.

15 DATED this 6th day of February, 2025.

DATED this 6 day of February, 2025.

NEVADA DEPARTMENT OF BUSINESS AND
INDUSTRY, REAL ESTATE DIVISION

17
18 By: 
19 LINDA ABRAMS
20 Respondent

By: 
SHARATH CHANDRA
Administrator

21 Approved as to form:

AARON D. FORD
Attorney General

24 By: /s/ Phil W. Su
25 PHIL W. SU (Bar No. 10450)
26 Senior Deputy Attorney General
27 1 State of Nevada Way, Ste. 100
28 Las Vegas, Nevada 89119
(702) 486-3655
Attorneys for Real Estate Division

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ORDER APPROVING STIPULATION

Case No. 2024-236

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 February 11-13, 2025, and the Commission being fully apprised in the premises, and good cause appearing,

IT IS ORDERED that the above Stipulation for Settlement of Disciplinary Action is approved in full.

Dated: this 19th day of February, 2025.

REAL ESTATE COMMISSION
STATE OF NEVADA

By: 
President, Nevada Real Estate Commission