

1 ASHLIE L. SURUR, ESQ.
2 Nevada Bar No. 11290
3 asurur@lawhjc.com

4 **HALL, JAFFE & CLAYTON, LLP**
5 7425 Peak Drive
6 Las Vegas, Nevada 89128
7 (702) 316-4111
8 Fax (702) 316-4114

9 *Attorneys for Dorothy Keith*

FILED

NOV 15 2017

NEVADA COMMISSION OF
COMMON INTEREST COMMUNITIES
AND CONDOMINIUM HOTELS

10 **BEFORE THE COMMISSION FOR COMMON-INTEREST**
11 **COMMUNITIES AND CONDOMINIUM HOTELS**
12 **STATE OF NEVADA**

13 Sharath Chandra, Administrator, Real
14 Estate Division, Department of Business &
15 Industry, State of Nevada,

16 *Petitioner,*

17 vs.

18 Dorothy Keith and Hacienda La Caliente
19 Homeowners Association,

20 *Respondents.*

Case No.: 2016-3611

**ANSWER TO COMPLAINT FOR
DISCIPLINARY ACTION**

21 Defendant, Dorothy Keith ("Keith"), by and through her attorney, Ashlie L. Surur, Esq.
22 of Hall, Jaffe & Clayton, LLP, answers the Complaint for Disciplinary Action, filed October 2,
23 2017, ("Complaint") as follows:

24 **JURISDICTION AND NOTICE**

25 1. Answering Paragraphs 1 and 2 of the Complaint, on information and belief Keith
26 admits all allegations.

27 **FACTUAL ALLEGATIONS**

28 2. Answering Paragraph 3 of the Complaint, on information and belief, Keith
admits that in 2016, the Division was informed by a board member for the Association that
Keith was being paid for providing services to the Association but denies that Keith was paid
for providing services to the Association.

3. Answering Paragraphs 4, 5, 6, 7, 8, 9, 11, 14 and 15 of the Complaint Keith
admits all allegations on information on information and belief. Keith reserves the right to
object to each referenced document as inadmissible for not being not genuine or authentic, as

1 lacking foundation, as hearsay, and for any other reasons set forth within the Rules of
2 Evidence or any other applicable law.

3 4. Answering Paragraph 10 of the Complaint, Keith is without sufficient
4 knowledge or information to form a belief as to the truth or falsity of the allegations and,
5 accordingly, the allegations are denied.

6 5. Answering Paragraph 12 of the Complaint, Keith admits that she stated that
7 "these checks appear to be reimbursements from/to petty cash. None of these monies were to
8 my benefit, nor kept by me. "Casual labor" was paid from petty cash to Bob" and denies the
9 remaining allegations.

10 6. Answering Paragraph 13 of the Complaint, Keith denies all allegations.

11 VIOLATIONS OF LAW

12 7. Answering Paragraphs 16, 17, 18, 19, 20, and 21 of the Complaint, Keith denies
13 all allegations.

14 AFFIRMATIVE DEFENSES

15 Keith asserts the following affirmative defenses:

16 1. Keith asserts that Petitioner fails to state an essential element of one or more of
17 its claims or causes of action against Keith.

18 2. Keith asserts that it substantially complied with all statutory requirements.

19 3. Keith reserves its right to assert additional affirmative defenses in the event
20 discovery indicates that additional affirmative defenses would be appropriate.

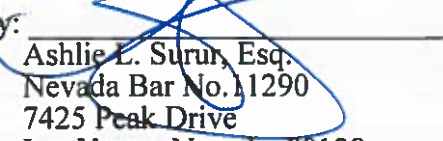
21 PRAYER FOR RELIEF

22 Keith prays for relief as follows:

23 1. That the complaint be dismissed without discipline.

24 Dated: November 15, 2017.

25 HALL, JAFFE & CLAYTON, LLP

26 By: 
27 Ashlie L. Surur, Esq.
28 Nevada Bar No. 11290
7425 Peak Drive
Las Vegas, Nevada 89128
Attorneys for Dorothy Keith

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I certify that on November 15, 2017, I served a true and correct copy of the foregoing Answer to Complaint for Disciplinary Action by placing an original or true copy thereof in a sealed envelope, and depositing it in the U.S. Mail, postage prepaid, at Las Vegas, Nevada, addressed to the parties as follows:

Michele D. Briggs, Esq.
Senior Deputy Attorney General
555 E. Washington Ave., Suite 3900
Las Vegas, Nevada 89101

Hand Delivered to:

Attn: Legal Administrative Officer
Common Interest Communities
And Condominium Hotel
3300 W. Sahara Avenue, Ste 350
Las Vegas, Nevada 89102

/s/Alexandria Raleigh
An Employee of HALL JAFFE & CLAYTON, LLP