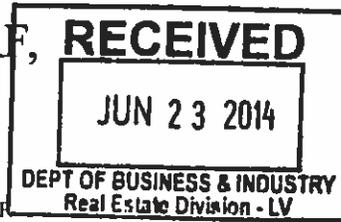


Robert P. Fahrendorf†
Thomas E. Viloría*
R. Shawn Oliphant
Raymond E. Oster
Nathan J. Aman

Patrick R. Millsap
James J. Barnes
Stephanie K. Funk
†Of Counsel
*Also Admitted in CA

FAHRENDORF, VILORIA,
OLIPHANT
& OSTER, L.L.P.



ATTORNEYS
AND
COUNSELORS
AT LAW

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June 19, 2014

Via Certified Mail

Return Receipt Requested: 7005 2570 0001 8562 8596

Rebecca Hardin
State of Nevada Real Estate Division
2501 East Sahara Avenue, Suite 303
Las Vegas, NV 89104

Re: NRED v. KAREN GREATHOUSE
REN 13-06-02-034
REN 10-03-01-050
REN 12-02-04-039

Dear Ms. Hardin:

Enclosed herewith please find the original and one copy of the *Answer to Complaint* in each of the above-referenced case numbers. It is respectfully requested that a file-stamped copy of each Answer be returned to our office in the self-addressed stamped envelope also enclosed herewith.

Thank you for your assistance.

Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

FAHRENDORF, VILORIA,
OLIPHANT & OSTER L.L.P.

Danielle L. Kent, Paralegal to
R. Shawn Oliphant, Esq.

/dlk
Enclosures as stated.

Put in mail 07/14

ORIGINAL

FILED

JUN 23 2014

REAL ESTATE COMMISSION
BY *[Signature]*

1 R. Shawn Oliphant, Esq.
Nevada Bar No. 6441
2 FAHRENDORF, VILORIA,
OLIPHANT & OSTER L.L.P.
3 P.O. Box 3677
Reno, Nevada 89505
4 (775) 348-9999
Attorneys for Karen Greathouse

6 BEFORE THE REAL ESTATE COMMISSION

7 STATE OF NEVADA

8 GAIL J. ANDERSON, Administrator, REAL
ESTATE DIVISION, DEPARTMENT OF
9 BUSINESS & INDUSTRY, STATE OF
NEVADA,

Case No: REN 12-02-04-039

ANSWER TO COMPLAINT

Petitioner,

vs.

12 KAREN GREATHOUSE

Respondent.

15 COMES NOW Respondent, KAREN GREATHOUSE ("Greathouse"), by and through
16 her counsel of record, Fahrendorf, Viloría, Oliphant & Oster L.L.P. and in answer to Petitioner's
17 Complaint hereby admits, denies, and alleges as follows:

JURISDICTION

19 In answer to the Jurisdiction section of the Complaint, Respondent admits that she is a
20 licensed real estate broker and property manager by the Division. The remaining allegations
21 contained in the Jurisdiction section state legal conclusions and do not require a response from this
22 Respondent; however, to the extent a response is required by rule, Respondent denies the allegations
23 that are inconsistent with the referenced statutes and codes.

FACTUAL ALLEGATION

25 1. In answer to paragraph 1 of the Complaint, Respondent admits the allegations
26 contained therein.

27 2. In answer to paragraph 2 of the Complaint, Respondent admits the allegations
28 contained therein.

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1 3. In answer to paragraph 3 of the Complaint, Respondent admits the allegations
2 thereof and affirmatively asserts that the Burketts requested the property not be listed with the MLS
3 consistent with the MLS Waiver of Benefits executed by the Burketts on the same day as the
4 Exclusive Right to Sell Contract. *See Exhibit 1.*

5 4. In answer to paragraph 4 of the Complaint, Respondent admits the allegations
6 contained therein.

7 5. In answer to paragraph 5 of the Complaint, Respondent admits the allegations
8 contained therein. In addition, the bank of this short sale made two counter-offers of \$81,500 with
9 \$15,000 cash contribution from seller on July 8, 2011 and \$81,000 requesting no cash contribution
10 from seller on August 18, 2011. DP Real Estate's counter-offer was \$77,500.

11 6. In answer to paragraph 6 of the Complaint, Respondent admits the allegations
12 contained therein.

13 7. In answer to paragraph 7 of the Complaint, Respondent denies the allegations
14 contained therein.

15 8. In answer to paragraph 8 of the Complaint, Respondent admits the allegations
16 contained therein.

17 9. In answer to paragraph 9 of the Complaint, Respondent admits the allegations
18 contained therein.

19 10. In answer to paragraph 10 of the Complaint, Respondent admits the allegations
20 contained therein.

21 11. In answer to paragraph 11 of the Complaint, Respondent denies the allegations
22 contained therein.

23 12. In answer to paragraph 12 of the Complaint, Respondent admits the allegations
24 contained therein.

25 13. In answer to paragraph 13 of the Complaint, Respondent is without sufficient
26 knowledge or information with which to form a belief as to the truth of all of the allegations
27 contained therein, and upon such basis deny said allegations.
28

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1 23. The allegations contained in Paragraph 23 requests relief and do not require a
2 response from this Answering Respondent; however, to the extent a response is required by rule,
3 Answering Respondent denies the allegations contained therein.

4 AFFIRMATIVE DEFENSES

5 1. The Complaint fails to state a claim against Answering Respondent upon which relief
6 can be granted.

7 2. The Respondent is not guilty of violating any Order of the Commission, any
8 agreement with the Division, or any provision of NRS 645, 116, 118, 118A, 118B, 645A, 645C or
9 any regulation adopted pursuant thereto.

10 3. The Respondent is not guilty of gross negligence or incompetence in performing any
11 act for which she holds a license.

12 4. The Division has refused to produce all communications, reports, affidavits or
13 depositions in its possession relevant to the Complaint and its Complaint should be barred as a
14 result thereof.

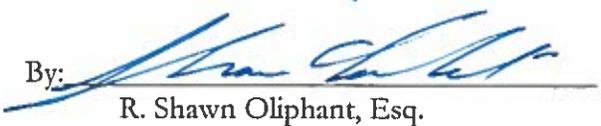
15 5. Respondent has no interest in or any ownership of DP Real Estate Investment, Inc.
16 and Dave Provenzano is not a member of Respondent's immediate family requiring disclosure under
17 NAC 645.640.

18 6. The Respondent is not guilty of any conduct which constitutes deceitful, fraudulent,
19 or dishonest dealing.

20 7. The Respondent has not breached her obligation of absolute fidelity or obligation to
21 deal fairly with all parties to the transaction.

22 DATED this 19 day of June, 2014.

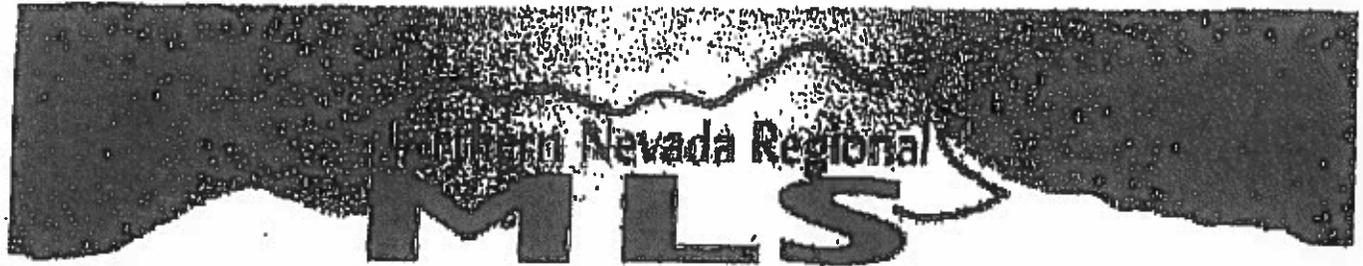
23
24 FAHRENDORF, VILORIA,
OLIPHANT & OSTER L.L.P.

25
26
27 By: 

R. Shawn Oliphant, Esq.
Nevada Bar No. 6441
Attorneys for Karen Greathouse

EXHIBIT "1"

EXHIBIT "1"



MLS Waiver of Benefits

Properties entered into the Northern Nevada Regional MLS (NNRMLS) reach 3400 members in the Northern Nevada area. Listings represented are from Reno/Sparks to Carson City to Gardnerville/Minden, to Yerington, Fernley, Tahoe, Fallon and beyond. Once a property is listed, the resources of over 400 offices become immediately available to assist in the sale of listed properties.

Property data is available to NNRMLS members electronically through the MLS computer system. The internet-based MLS system hosts over 300,000 records, including active and sold properties. In addition, millions of real estate consumers can preview basic information about currently listed properties on national real estate web sites and countless local broker/office websites.

The members of the NNRMLS, representing the Reno/Sparks Association of REALTORS®, the Sierra Nevada Association of REALTORS®, and other neighboring Associations, have served our local communities for over 70 years, with electronic MLS systems for over 50 years. More than \$4.25 billion in residential real estate sales transactions were reported in 2005.

Members are backed by resources of the NNRMLS, the Reno/Sparks and Sierra Nevada REALTOR® Associations, the Nevada Association of REALTORS®, and the National Association of REALTORS®. They are recognized as professionals in the real estate industry and adhere to a strict Code of Ethics.

Waiver of Benefits

To: Northern Nevada Regional MLS Inc.
P.O. Box 70429
Reno, NV 89570

RECEIVED
MAY 09 2011
NNRMLS
RETURNED
FOR COMPLETION

I/We hereby certify that I/We understand the above mentioned MLS benefits and that the following broker/age:
GREATHOUSE REAL ESTATE COMPANY
▲ (MLS Official Company Name)

has fully informed me/us of all additional benefits associated with the NNRMLS and it's Multiple Listing Service. However, we do not wish information about our property, located at:
1720 Wesley Dr. Reno NV
▲ (property address)

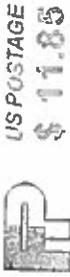
to be disseminated or published in the Multiple Listing Service, and hereby waive any and all benefits associated with the MLS. I/we also acknowledge the understanding that my broker
 is is not
offering compensation to cooperate with any other real estate agents in the marketing or sale of this property. Unless otherwise specified by owner(s), this listing will be input into the MLS upon the sale of the property.

▲ Owner: [Signature] ▲ Date: 5-9-11
▲ Owner: Kari Brunell ▲ Date: 5-9-11
▲ Agent/Broker: [Signature] ▲ Date: 5-9-11
▲ List Date: 5-9-11 ▲ Expiration Date: 10-9-11 Date to enter into MLS (if temporary) _____

▲ Indicates a required entry: a complete and signed copy of this form must be filed with NNRMLS within 48 hours of owner(s) signature(s) on listing. Fax to 823-8809.
Incomplete forms will be returned and will not be considered "received" until resubmitted with complete info. rev.0405



7005 2570 0001 8562 8596



US POSTAGE
\$ 11.85

Mailed From 89509
06/19/2014
032A 0061820316



S13-046/S14-035/S14-036

**FAHRENDORF,
VILORIA,
OLIPHANT &
OSTER
L.L.P.**

ATTORNEYS
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P.O. BOX 3677 ~RENO, NEVADA 89505

Via Certified Mail

Rebecca Hardin
State of Nevada Real Estate Division
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Las Vegas, NV 89104