

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

REAL ESTATE COMMISSION
BY *R. Lisa Kelly*

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JOSEPH D. DECKER, Administrator,
REAL ESTATE DIVISION, DEPARTMENT
OF BUSINESS & INDUSTRY,
STATE OF NEVADA

CASE NO. RES 14-11-39-185

Petitioner,

ANSWER TO COMPLAINT

vs.

MICHAEL A. PANCIRO,

Respondent.

COMES NOW, Respondent, MICHAEL A. PANCIRO (hereinafter "Respondent"), by and through his undersigned counsel of record, ALBRIGHT, STODDARD, WARNICK & ALBRIGHT, and hereby files his Answer to Petitioner's Complaint, and admits, denies, and avers as follows:

FACTUAL ALLEGATIONS

1. In answering Paragraphs 1 through 4 of Petitioner's Complaint, Respondent admits the allegations contained therein.
2. In answering Paragraph 5 of Petitioner's Complaint, Respondent denies that "marketing materials" were included in or with the letter or that this was the letter's intent or purpose, but otherwise admits the remaining allegations contained therein.
3. In answering Paragraphs 6 through 11 of Petitioner's Complaint, Respondent admits the allegations contained therein.

VIOLATION

4. In answering Paragraphs 12 and 13 of Petitioner's Complaint, Respondent denies the allegations contained therein.

DISCIPLINE AUTHORIZED

5. In answering Paragraph 14 of Petitioner's Complaint, Respondent admits that this is a correct statement of the law, but denies its applicability herein.

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LAW OFFICES
A PROFESSIONAL CORPORATION

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SIXTH AFFIRMATIVE DEFENSE

Respondent has sought and obtained professional counseling and appropriate healthcare services to overcome the emotional and psychiatric disabilities from which he was suffering at the time the events at issue herein occurred.

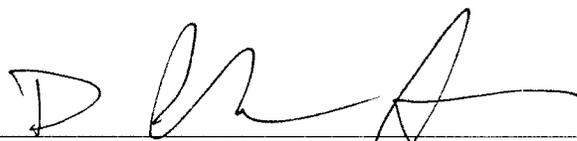
SEVENTH AFFIRMATIVE DEFENSE

Respondent hereby incorporates by reference any other affirmative defenses which may be available under the facts, law, and administrative rules governing these proceedings as if fully set forth herein. In the event further investigation or discovery reveals the applicability of any such defenses, Respondent reserves the right to seek leave of the Commission to amend this Answer to specifically assert any such defense. Such defenses are herein incorporated by reference for the specific purpose of not waiving any such defense.

WHEREFORE, Respondent prays for a ruling in his favor.

DATED this 29th day of September, 2014.

**ALBRIGHT, STODDARD, WARNICK
& ALBRIGHT**



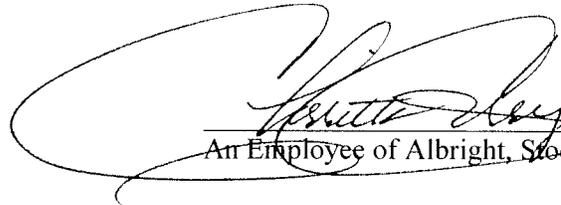
D. CHRIS ALBRIGHT, ESQ.
Nevada Bar No. 004904
801 South Rancho Drive, Suite D-4
Las Vegas, Nevada 89106
(702) 384-7111
Attorneys for Respondent

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that I am an employee of ALBRIGHT, STODDARD, WARNICK & ALBRIGHT, and that on this 29th day of September, 2014, service was made by the following mode/method of the foregoing **ANSWER TO COMPLAINT**, to the following persons:

REAL ESTATE DIVISION	<input type="checkbox"/>	Certified Mail
STATE OF NEVADA	<input type="checkbox"/>	Electronic Filing/Service
Joseph D. Decker	<input type="checkbox"/>	Email
Legal Administrative Officer	<input type="checkbox"/>	Facsimile
Department of Business and Industry	<input type="checkbox"/>	Hand Delivery
2501 East Sahara Avenue	<input checked="" type="checkbox"/>	U.S. Regular Mail
Las Vegas, Nevada 89104-4137		
(702) 486-4033		

Kimberly A. Arguello	<input type="checkbox"/>	Certified Mail
Senior Deputy Attorney General	<input type="checkbox"/>	Electronic Filing/Service
555 E. Washington Avenue, Suite 3900	<input type="checkbox"/>	Email
Las Vegas, Nevada 89101	<input type="checkbox"/>	Facsimile
(702) 486-3094	<input type="checkbox"/>	Hand Delivery
<i>Attorneys for Real Estate Division</i>	<input checked="" type="checkbox"/>	U.S. Regular Mail


 An Employee of Albright, Stoddard, Warnick & Albright