

SEP 04 2015

REAL ESTATE COMMISSION
BY *[Signature]*

1 Schwartz Flansburg PLLC
Frank M. Flansburg III, Esq.
2 Nevada Bar No. 6974
Brian Blankenship, Esq.
3 Nevada Bar No. 11522
6623 Las Vegas Blvd. South, Suite 300
4 Las Vegas, Nevada 89119
Telephone: (702) 385-5544
5 Facsimile: (702) 385-2741
frank@nvfirm.com
6 brian@nvfirm.com
Attorneys for Carmen Thomas

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

9 JOSEPH R. DECKER, Administrator,
10 REAL ESTATE DIVISION, DEPARTMENT
11 OF BUSINESS & INDUSTRY,
STATE OF NEVADA,

Case No. 2014-3746

Petitioner,

ANSWER TO COMPLAINT

12 vs.

13 CARMEN THOMAS,

14 Respondent.

15
16 Respondent Carmen Thomas ("Respondent") by and through the law firm of Schwartz
17 Flansburg PLLC for Answer to Petitioner's Complaint on file herein answers, denies and alleges
18 as follows:

19 1. In answering the allegations contained in Paragraphs 1-2 of Petitioner's
20 Complaint, Respondent admits the allegations contained therein.

21 2. In answering the allegations contained in Paragraphs 3-5, 16, and 29-31 of
22 Petitioner's Complaint, Respondent is without knowledge or information sufficient to form a
23 belief as to the truth of the allegations contained therein; and therefore, deny the same.

24 3. In answering the allegations contained in Paragraphs 6-15, 17-28, and 32-38 of
25 Petitioner's Complaint, Respondent denies the allegations contained therein.

26 ///

27 ///

28 ///

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 hereby certify that the foregoing ANSWER TO COMPLAINT was submitted via electronic mail addressed on the 1st day of September, 2015 to:

Via Email: kkizer@ag.nv.gov
Keith E. Kizer, Esq.
Deputy Attorney General
State of Nevada
555 E. Washington Avenue, Suite 3900
Las Vegas, NV 89101

I further certify that, on September 9, 2015, I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, addressed to:

Nevada Department of Business and Industry
Real Estate Division
Attn: Joseph R. Decker, Administrator
2501 East Sahara Avenue
Las Vegas, Nevada 89104-4137


Michelle Tuason, an employee of
Schwartz Flansburg PLLC