

FILED

APR 10 2014

REAL ESTATE COMMISSION
Rebecca A. ...

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11 **BEFORE THE REAL ESTATE COMMISSION**
12 **STATE OF NEVADA**

13 **GAIL J. ANDERSON, ADMINISTRATOR,**
14 **REAL ESTATE DIVISION, DEPARTMENT**
15 **OF BUSINESS & INDUSTRY, STATE OF**
16 **NEVADA,**

Case No. RES 13-01-28-225

Petitioner,

vs.

RESPONDENT'S ANSWER

RICHARD A. WILLER,

Respondent.

17
18 Respondent Richard Willer, by and through his attorney of record Stephen
19 R. Minagil, Esq. of PECOS LAW GROUP, hereby sets forth his Answer to Complaint
20 filed February 20, 2014.

21 **ANSWER**

22 A. Respondent admits the allegations contained in paragraphs 1, 2, 3,
23 4, 5, 7, 9, 12, 17, 19 and 20.

24 B. Regarding the allegations contained in paragraph 6, Respondent
25 asserts he came to Dara's apartment to look at the kitchen sink not draining,
26 along with the garbage disposal that did not work.

27 C. Respondent denies the allegations contained in paragraph 8, except
28 he admits he was wearing a jacket.

1 D. Respondent is without knowledge or information upon which to
2 form a belief as to the truthfulness of the allegations contained in paragraph 10,
3 and therefore denies same.

4 E. Regarding the allegations contained in paragraph 11, Respondent
5 asserts he removed his clothing after Dara left the room and not in the presence
6 of Dara's daughter.

7 F. Respondent denies the allegations contained in paragraph 13, 14,
8 15, and first sentence of paragraph 16.

9 G. Regarding the allegation contained in second sentence of paragraph
10 16, Respondent is without knowledge or information upon which to form a belief
11 as to the truthfulness of the allegations set forth in the second sentence of
12 paragraph 16, and therefore denies same.

13 H. Respondent denies the allegation contained in paragraph 18.

14 I. The allegations contained in paragraph 21 are not allegations of fact
15 requiring a response.

16 **FIRST AFFIRMATIVE DEFENSE**

17 Respondent's actions of asking to remove his clothes in order to
18 accomplish under sink repairs so that he would not get drenched as he did on
19 a prior occasion, without clarifying it was his intention to remove all of his
20 clothing including his underwear, was a result of an unintentional
21 misunderstanding, and is not deceitful behavior as it was not intended to
22 defraud or gain a benefit by any misrepresentation.

23 **SECOND AFFIRMATIVE DEFENSE**

24 The actions complained of were not done in the course of
25 Respondent's capacity as a licensed salesperson.

26
27 ...

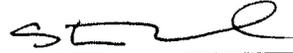
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WHEREFORE, Respondent prays that Petitioner take nothing by reason of its Complaint on file.

DATED this 9 day of April, 2014.

PECOS LAW GROUP



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