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BEFORE THE REAL ESTATE COMMISSION REAL ESTATE COMMISSION

STATE OF NEVADA

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

Case No. RES 13-06-06-345

ANSWER TO COMPLAINT

Petitioner,

vs.

YERANUHI (ANNA) ARAKELYAN,

Respondent.

Respondent YERANUHI ARAKELYAN ("Respondent" or "Anna") by and through counsel, hereby in support of its Answer to the Complaint of Petitioner REAL ESTATE DIVISION, DEPARTMENT OF BUSINESS & INDUSTRY, STATE OF NEVADA ("Petitioner") on file herein, and hereby responds thereto upon information and belief, by admitting, denying, and alleging as follows:

FACTUAL ALLEGATIONS

1. Answering paragraphs 1-2 of Petitioner's Complaint, Respondent states that the public or other records speak for themselves and Respondent denies any allegations that are inconsistent with the record or the facts.

2. Answering paragraph 3 of Petitioner's Complaint, Respondent denies the allegations contained therein.

3. Answering paragraphs 4-7 of Petitioner's Complaint, Respondent states that the public or other records speak for themselves and Respondent denies any allegations that are inconsistent with the record or the facts.

4. Answering paragraph 8 of Petitioner's Complaint, Respondent states that Petitioners use of the phrase "within a reasonable time" is ambiguous and, therefore, denies the allegations contained therein.

5. Answering paragraphs 9-10 of Petitioner's Complaint, Respondent states that the public or

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1 other records speak for themselves and Respondent denies any allegations that are inconsistent with
2 the record or the facts.

3 6. Answering paragraph 11 of Petitioner’s Complaint, Respondent states that Petitioners use
4 of the phrase “within a reasonable time” is ambiguous and, therefore, denies the allegations
5 contained therein.

6 7. Answering paragraphs 12-21 of Petitioner’s Complaint, Respondent states that the public
7 or other records speak for themselves and Respondent denies any allegations that are inconsistent
8 with the record or the facts.

9 8. Answering paragraph 22 of Petitioner’s Complaint, Respondent states that it has no
10 recollection of what Respondent “told the Rubylyn Avenue tenant” and, therefore, neither admits nor
11 denies the allegations contained therein.

12 9. Answering paragraphs 23-32 of Petitioner’s Complaint, Respondent states that the public
13 or other records speak for themselves and Respondent denies any allegations that are inconsistent
14 with the record or the facts.

15 **VIOLATIONS**

16 10. Answering paragraphs 33-34 of Petitioner’s Complaint, Respondent denies the allegations
17 contained therein.

18 **DISCIPLINE AUTHORIZED**

19 11. Answering paragraphs 35-37 of Petitioner’s Complaint, Respondent states that no
20 response is required to the extent that they assert legal conclusions rather than factual allegations; to
21 the extent a response is required, Respondent denies the averment.

22 **AFFIRMATIVE DEFENSES**

23 Respondent alleges the following separate and distinct defenses to Petitioner’s Complaint on
24 file herein.

25 **FIRST AFFIRMATIVE DEFENSE**

26 Respondent has not violated any relevant Nevada Revised Statute or Nevada Administrative
27 Code.

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