

LAW OFFICES OF

Lee A. Drizin
LEE A. DRIZIN CHTD.

LEE A. DRIZIN
ETHAN M. KOTTLER
LESTER A. BERMAN
WWW.DRIZINLAW.COM



April 6, 2018

VIA U.S. MAIL

Sharath Chandra, Administrator
Real Estate Division
Department of Business & Industry
State of Nevada
3300 W. Sahara Avenue, Suite 350
Las Vegas, NV 89102

Re: **Reda Maria Guden**
Case No. 2016-2130

Dear Administrator:

Enclosed please find Reda Maria Guden's Answer to Complaint in the above-referenced matter.

Should you have any questions or concerns, please give me a call.

Very truly yours,

LEE A. DRIZIN, CHTD.

A handwritten signature in blue ink that reads "Lester A. Berman".

LESTER A. BERMAN, ESQ.

LB/slh

cc: Keith Kizer
Carolyn Washington

2460 PROFESSIONAL COURT
SUITE 110
LAS VEGAS, NV 89128

TEL
(702) 798-4955

FAX
(702) 798-5955

EMAIL
LEE@LEEDRIZIN.COM
ETHAN@LEEDRIZIN.COM
LESBERMAN@LEEDRIZIN.COM

FILED

APR 10 2018

REAL ESTATE COMMISSION
BY: *[Signature]*

1 LEE A. DRIZIN, ESQ.
Nevada Bar No. 4971
2 LESTER A. BERMAN, ESQ.
Nevada Bar No. 0149
3 LEE A. DRIZIN, CHTD.
2460 Professional Court, Suite 110
4 Las Vegas, Nevada 89128
(702) 798-4955 FAX (702) 798-5955
5 lee@leedrizin.com
lesberman@leedrizin.com
6 Attorneys for Reda Maria Guden

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8 **BEFORE THE REAL ESTATE COMMISSION**
STATE OF NEVADA

9 SHARATH CHANDRA, Administrator,
10 REAL ESTATE DIVISION,
11 DEPARTMENT OF BUSINESS &
INDUSTRY, STATE OF NEVADA,

Case No.: 2016-2130

12 Petitioner,

13 vs.

14 REDA MARIA GUDEN,

15 Respondent.

16 **ANSWER TO COMPLAINT**

17 Respondent, Reda Maria Guden, by and through her attorney, Lee A. Drizin, Esq.
18 of Lee A. Drizin Chtd., hereby answers the Complaint of Petitioner and admits, denies and
19 alleges as follows:

20 **JURISDICTION**

21 Respondent admits that jurisdiction in this matter with the Division and Commission
22 is proper.

23 **FACTUAL ALLEGATIONS**

24 1. Answering Paragraphs 1, 2, 4, 7, 9, 10, 12, 14, 15, 17, 18, 19, 21, 22, 23, 24,
25 25, 26, 27 and 28 of the Complaint, Respondent admits the allegations contained within
26 said paragraphs.

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1 2. Answering Paragraph 3 of the Complaint, Respondent denies that Account
2 5702 is the correct account number for the account referenced in this Paragraph and
3 hereby incorporates by reference this denial into Paragraphs 4, 5, 15, 17, 18, 21, 22, 23,
4 24, 25, 31, 37, 38, 39 and 40. The correct account number is XXXXXX5072.

5 3. Answering Paragraph 6 of the Complaint, Respondent denies that Account
6 8742 was an operating account for American First Realty, LLC as such account was used
7 solely for the collection of rents and payment for expenses related to certain properties
8 managed by Davit Hakobyan. Expenses for American First Realty, LLC were not paid from
9 this account.

10 4. Answering Paragraphs 8 and 20 of the Complaint, Respondent denies each
11 and every allegation therein.

12 5. Answering Paragraph 11 of the Complaint, Respondent admits that the
13 account existed at JP Morgan Chase Bank but denies the remaining allegations contained
14 in said Paragraph as such account was used solely for the security deposits related to
15 certain properties managed by Davit Hakobyan. Expenses for American First Realty, LLC
16 were not paid from this account.

17 6. Answering Paragraph 13 of the Complaint, Respondent admits that the
18 account existed at Bank of the West but denies the remaining allegations contained in said
19 Paragraph as such account was used solely for the security deposits related to certain
20 properties managed by Davit Hakobyan. Expenses for American First Realty, LLC were not
21 paid from this account.

22 7. Answering Paragraph 16 of the Complaint, Respondent admits that security
23 deposits were deposited into Account 8303 but no rents were deposited into that account.

24 VIOLATIONS

25 8. Answering Paragraphs 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41 and 42
26 of the Complaint, Respondent denies each and every allegation contained within said
27 Paragraphs.

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Therefore, based on all the above, Respondent requests that the Commission find in her favor regarding the Complaint filed in this matter and dismiss such complaint without the imposition of any administrative penalties.

DATED this ____ day of April, 2018.

LEE A. DRIZIN, CHTD.



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LESTER A. BERMAN, ESQ.
Nevada Bar No. 0149
2460 Professional Court, Suite 110
Las Vegas, Nevada 89128
(702) 798-4955 FAX (702) 798-5955
Attorneys for Reda Maria Guden