OCAMPC WISEMAN LAV	2 1 3 4 1 5 5 6 7 7 2 8 9 10 5 11 1 12 1 13 14 15	OCAMPO WISEMAN LAW ¹ SARAH A. OCAMPO, ESQ. Nevada Bar No. 8461 Sarah@ocampowisemanlaw.com TIMOTHY A. WISEMAN, ESQ. Nevada Bar No. 13786 tim@ocampowisemanlaw.com 5450 W. Sahara Ave. Suite 330 Las Vegas, NV 89146 Telephone: (702) 850-7798 Facsimile: (702) 850-7798 Facsimile: (702) 850-7798 Attorneys Arturo Valdovinos BEFORE THE COMMISSION OF A SHARATH CHANDRAM, Administrator, REAL ESTATE DIVISION, DEPARTMENT OF BUSINESS AND INDUSTRY, STATE OF NEVADA. Petitioner, Vs.		
	17 _	License No. A.0005988-RES And all related matters		
	18 ⁴ 19	RESPONDENT'S ANSWER TO COMPI	AINT AND NOTICE OF HEARING	
	20	PROCEDURAL HISTORY		
2	21	1. Answering paragraph 1, Respondent admits, but expressly reserves the		
2	22	right to dispute allegations made in that complaint.		
2	23	2. Answering paragraphs 2 – 3, Respondent admits.		
2	24			
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2	26	¹ Ocampo Wiseman Law was formerly known as Morris Law Center		
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OCAMPO WISEMAN LAW ATTORNEYS AT LAW		1	3. Answering paragraph 4, Respondents avers that no response is required.		
		2	To the extent that a response may be required, respondent admits minor prior		
		3	disciplinary action in 2007.		
		4	Factual allegations		
		5	4. Answering paragraphs 1 – 2, Respondent admits.		
		6	5. Answering paragraph 3, Respondent admits submitting the rebuttal letter		
		7	but denies communicating the assignment results directly to the homeowner.		
		8	6. Answering paragraphs 4 – 7, Respondent admits.		
		9	7. Answering paragraphs 8 – 9, Respondent denies.		
	≥ 1	.0	8. Answering paragraphs 10 – 11, Respondent admits.		
	∟ ⊢ 1	1	9. Answering paragraph 12, Respondent denies.		
	× 1	2	10. Answering paragraphs 13 – 17, Respondent admits.		
		3	11. Answering paragraph 18-19, Respondent denies.		
	00 1	4	12. Answering paragraphs 20, Respondent admits.		
	4 1	5	13. Answering paragraph 21, Respondent denies.		
	1	.6	14. Answering paragraphs 22 –28, Respondent admits.		
	1	7	15. Answering paragraph 29, Respondent denies.		
	1	8	16. Answering paragraph 30, Respondent admits.		
	1	9	17. Any paragraphs not expressly addressed or any statements not expressly		
	2	.0	admitted are denied.		
	2	1	VIOLATIONS OF LAW		
	2	2	Respondent avers that the section labeled violations of law contains legal		
	2	3	conclusions and that no response is required. To the extent that a response might be		
	2	4	required, Respondent denies. Respondent specifically, though without limitation, denies		
	2	5	that any errors were intentional or that Respondent intentionally committed any ethical		
	2	.6	violations.		
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AFFIR	MATIVE	DEFENSES

Respondent has acted in good faith at all times and believed at all relevant 1. times that the actions taken were correct ethically and in accordance with the applicable laws and regulations. See e.g. Lowe v. Dept t of Commerce, Real Estate Div., 89 Nev. 488, 490, 515 P.2d 388, 389 (1973) (noting that administrative bodies should consider intent).

Respondent has not willfully or deliberately violated any ethical or legal 2. obligations.

Respondent has not knowingly provided any false information to any 3. person or otherwise knowingly engaged in any deceitful, fraudulent, or dishonest conduct.

Dated this 30th day of September, 2024.

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By:/s/ Timothy A. Wiseman_ Timothy A. Wiseman, Esq. Nevada Bar No. 13786 Attorneys for Respondent

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