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FILED

MAR 11 2019

NEVADA COMMISSION OF
COMMON INTEREST COMMUNITIES
AND CONDOMINIUM HOTELS

BEFORE THE COMMISSION FOR COMMON INTEREST
COMMUNITIES AND CONDOMINIUM HOTELS
STATE OF NEVADA

8 Sharath Chandra, Administrator, Real Estate
9 Division, Department of Business & Industry,
10 State of Nevada,

*
Case No.: 2018-1481

10 Petitioner,
11 vs.

LOS VERDES COMMUNITY
ASSOCIATION'S ANSWER TO NOTICE
OF COMPLAINT AND NOTICE OF
HEARING

12 Los Verdes Community Association, Ruby
13 Consing, Sayeh Sadegh, Monica Blake, and
14 Mary Baumgartner

Respondents.

15 COMES NOW Respondent LOS VERDES COMMUNITY ASSOCIATION
16 ("Respondent"), by and through its attorneys of record, and hereby answers Petitioner's Notice
17 of Complaint and Notice of Hearing as follows:

18 JURISDICTION AND NOTICE

- 19 1. Answering Paragraph 1, Respondent admits the allegations contained therein.
20 2. Answering Paragraph 2, Respondent admits the allegations contained therein.

21 FACTUAL ALLEGATIONS

- 22 3. Answering Paragraph 3, Respondent admits the allegations contained therein.
23 4. Answering Paragraph 4, Respondent admits the allegations contained therein.
24 5. Answering Paragraph 5, Respondent admits the allegations contained therein.

- 1 6. Answering Paragraph 6, Respondent admits the allegations contained therein.
- 2 7. Answering Paragraph 7, Respondent admits the allegations contained therein.
- 3 8. Answering Paragraph 8, Respondent admits the allegations contained therein.
- 4 9. Answering Paragraph 9, Respondent admits the allegations contained therein.
- 5 10. Answering Paragraph 10, Respondent admits the allegations contained therein.
- 6 11. Answering Paragraph 11, Respondent admits the allegations contained therein.
- 7 12. Answering Paragraph 12, Respondent admits the allegations contained therein.
- 8 13. Answering Paragraph 13, Respondent admits the allegations contained therein.
- 9 14. Answering Paragraph 14, Respondent admits the allegations contained therein.
- 10 15. Answering Paragraph 15, Respondent admits only that separate counsel was
11 appointed by Respondent's insurance carrier to represent Respondent Consing with respect to the
12 Division's investigations. Respondent is without sufficient knowledge or information upon
13 which to base a belief as to the truth of the remaining allegations contained therein.
- 14 16. Answering Paragraph 16, Respondent admits the allegations contained therein.

VIOLATIONS OF LAW

- 15 17. Answering Paragraph 17, Respondent denies the allegations contained therein as
16 to itself. Respondent is without sufficient knowledge or information upon which to base a belief
17 as to the truth of the allegations contained therein as to other parties.
- 18 18. Answering Paragraph 18, Respondent denies the allegations contained therein as
19 to itself. Respondent is without sufficient knowledge or information upon which to base a belief
20 as to the truth of the allegations contained therein as to other parties.
- 21 19. Answering Paragraph 19, Respondent denies the allegations contained therein as
22 to itself. Respondent is without sufficient knowledge or information upon which to base a belief
23 as to the truth of the allegations contained therein as to other parties.
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