

Dobberstein,
9480 S. Eastern Ave., Suite 225
Las Vegas, Nevada 89123

1 ERIC DOBBERSTEIN, ESQ.
Nevada Bar #3712
2 QUOC THAI, ESQ.
Nevada Bar #16015
3 **DOBBERSTEIN LAW GROUP**
9480 S. Eastern Ave., Suite 225
4 Las Vegas, Nevada 89123
eric@dobbersteinlaw.com
5 qthai@dobbersteinlaw.com
Tel: 702-430-8900
6 Fax: 702-995-7005
Attorneys for Respondent John Bielun

FILED
DEC 23 2024
NEVADA COMMISSION FOR
COMMON INTEREST COMMUNITIES
AND CONDOMINIUM HOTELS
mgallo

7
8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 SHARATH CHANDRA, Administrator,
REAL ESTATE DIVISION, DEPARTMENT
11 OF BUSINESS & INDUSTRY, STATE OF
NEVADA
12 Petitioner,
13
14 vs.
15 JOHN BIELUN,
Respondent.

Case No.: 2023-622 and 2023-670

**RESPONDENT'S ANSWER TO
COMPLAINT FOR DISCIPLINARY
ACTION AND NOTICE OF HEARING**

17 Respondent, JOHN BIELUN, by and through his counsel, Eric Dobberstein Esq., and
18 Quoc Thai, Esq., of Dobberstein Law Group, hereby submit his Answer to the Real Estate
19 Division of the Department of Business and Industry's (hereinafter "Division") Complaint for
20 Disciplinary Action and Notice of Hearing.

21 **FACTUAL ALLEGATIONS**

- 22 1. Answering paragraph 1 of the Factual Allegations of the Complaint, Respondent
23 is without knowledge or information sufficient to form a belief as to the truth of the allegations
24 contained therein, and therefore, on that basis denies the same.
25 2. Answering paragraph 2 of the Factual Allegations of the Complaint, Respondent
26 is without knowledge or information sufficient to form a belief as to the truth of the allegations
27 contained therein, and therefore, on that basis denies the same.
28 3. Answering paragraph 3 of the Factual Allegations of the Complaint, Respondent

Case No. 2017-000000-000000
Las Vegas, Nevada 89123

1 is without knowledge or information sufficient to form a belief as to the truth of the allegations
2 contained therein, and therefore, on that basis denies the same.

3 4. Answering paragraph 4 of the Factual Allegations of the Complaint, Respondent
4 is without knowledge or information sufficient to form a belief as to the truth of the allegations
5 contained therein, and therefore, on that basis denies the same.

6 5. Answering paragraph 5 of the Factual Allegations of the Complaint, Respondent
7 is without knowledge or information sufficient to form a belief as to the truth of the allegations
8 contained therein, and therefore, on that basis denies the same.

9 6. Answering paragraph 6 of the Factual Allegations of the Complaint, Respondent
10 is without knowledge or information sufficient to form a belief as to the truth of the allegations
11 contained therein, and therefore, on that basis denies the same.

12 7. Answering paragraph 7 of the Factual Allegations of the Complaint, Respondent
13 is without knowledge or information sufficient to form a belief as to the truth of the allegations
14 contained therein, and therefore, on that basis denies the same.

15 8. Answering paragraph 8 of the Factual Allegations of the Complaint, Respondent
16 is without knowledge or information sufficient to form a belief as to the truth of the allegations
17 contained therein, and therefore, on that basis denies the same.

18 9. Answering paragraph 9 of the Factual Allegations of the Complaint, Respondent
19 admits the allegation.

20 10. Answering paragraph 10 of the Factual Allegations of the Complaint, Respondent
21 is without knowledge or information sufficient to form a belief as to the truth of the allegations
22 contained therein, and therefore, on that basis denies the same.

23 11. Answering paragraph 11 of the Factual Allegations of the Complaint, Respondent
24 is without knowledge or information sufficient to form a belief as to the truth of the allegations
25 contained therein, and therefore, on that basis denies the same.

26 12. Answering paragraph 12 of the Factual Allegations of the Complaint, Respondent
27 is without knowledge or information sufficient to form a belief as to the truth of the allegations
28 contained therein, and therefore, on that basis denies the same.

1 **DIVISION INVESTIGATOR REQUESTS FOR INFORMATION AND RESPONSES**

2
3 13. Answering paragraph 13 of the Division Investigator Requests for Information and
4 Responses of the Complaint, Respondent is without knowledge or information sufficient to form
5 a belief as to the truth of the allegations contained therein, and therefore, on that basis denies the
6 same.

7 14. Answering paragraph 14 of the Division Investigator Requests for Information and
8 Responses of the Complaint, Respondent admits the allegation.

9 15. Answering paragraph 15 of the Division Investigator Requests for Information and
10 Responses of the Complaint, Respondent is without knowledge or information sufficient to form
11 a belief as to the truth of the allegations contained therein, and therefore, on that basis denies the
12 same.

13 16. Answering paragraph 16 of the Division Investigator Requests for Information and
14 Responses of the Complaint, Respondent is without knowledge or information sufficient to form
15 a belief as to the truth of the allegations contained therein, and therefore, on that basis denies the
16 same.

17 17. Answering paragraph 17 of the Division Investigator Requests for Information and
18 Responses of the Complaint, Respondent is without knowledge or information sufficient to form
19 a belief as to the truth of the allegations contained therein, and therefore, on that basis denies the
20 same.

21 18. Answering paragraph 18 of the Division Investigator Requests for Information and
22 Responses of the Complaint, Respondent is without knowledge or information sufficient to form
23 a belief as to the truth of the allegations contained therein, and therefore, on that basis denies the
24 same.

25 19. Answering paragraph 19 of the Division Investigator Requests for Information and
26 Responses of the Complaint, Respondent is without knowledge or information sufficient to form
27 a belief as to the truth of the allegations contained therein, and therefore, on that basis denies the
28 same.

1 Respondent denies the allegations contained therein.

2 4. Answering paragraph 4 of the Violations of Law section of the Complaint,

3 Respondent denies the allegations contained therein.

4

5 **PRAYER FOR RELIEF**

6

6 WHEREFORE, Respondent expressly reserves the right to amend this Answer at or before

7 the time of the time of the disciplinary hearing of the action herein to include all items of damages

8 not yet ascertained, demands judgment against the Division, and pray for relief against the

9 Division as follows:

10

1. That Respondent is found not liable for all allegations contained in the Complaint;

11

2. Respondent is not imposing any fine or penalty as the result of the allegations

12

13 contained in the Complaint;

14

3. Respondent is not being ordered to pay any costs of the proceedings incurred by

15

16 the Division; and

17

4. Denial of the application for the appointment of a receiver for the Respondent.

18

19 DATED 17th day of December 2024.

20

21 DOBBERSTEIN LAW GROUP

22

23 By: /s/ Eric Dobberstein

24

ERIC DOBBERSTEIN, ESQ.

25

Nevada Bar #3712

26

QUOC THAI, ESQ.

27

Nevada Bar #16015

28

9480 S. Eastern Ave., Suite 225

Las Vegas, Nevada 89123

Attorneys for Respondent John Bielun

29

30

31

32

33