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

DISTRICT COURT
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.: 2023-979

**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.

FACTUAL ALLEGATIONS

- 21
- 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

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

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

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

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VIOLATIONS OF LAW

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2 1. Answering paragraph 1 of the Violations of Law section of the Complaint,
3 Respondent denies the allegations contained therein.

4 2. Answering paragraph 2 of the Violations of Law section of the Complaint,
5 Respondent denies the allegations contained therein.

PRAYER FOR RELIEF

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8 WHEREFORE, Respondent expressly reserves the right to amend this Answer at or before
9 the time of the disciplinary hearing of the action herein to include all items of damages not yet
10 ascertained, demands judgment against the Division, and pray for relief against the Division as
11 follows:

- 12 1. That Respondent is found not liable for all allegations contained in the Complaint;
13 2. Respondent is not being imposed any fine or penalty as the result of the allegations
14 contained in the Complaint;
15 3. Respondent is not being ordered to pay any costs of the proceedings incurred by
16 the Division; and
17 4. Denial of the application for the appointment of a receiver for the Respondent.

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19 DATED this 17th day of December 2024.

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21 DOBBERSTEIN LAW GROUP

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23 By: /s/ Eric Dobberstein
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