

FILED

FEB 24 2021

REAL ESTATE COMMISSION

BY Evelyn Rattle

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Nevada Bar No. 10084
NEVADA REAL ESTATE LAW, LLC
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Attorney for Respondent
JULES MITCHELL LEHR

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

SHARATH CHANDRA, Administrator,) Case No.: 2018-1584
REAL ESTATE DIVISION,)
DEPARTMENT OF BUSINESS &)
INDUSTRY, STATE OF NEVADA)

ANSWER TO PETITIONER'S COMPLAINT

FILED BY RESPONDENT
JULES MITCHELL LEHR

Petitioner,)

vs.)

JULES MITCHELL LEHR,)

Defendants.)

COMES NOW Respondent, JULES MITCHELL LEHR, ("Respondent"), by and through his attorney, KATHRYN HOLBERT, Esq., of NEVADA REAL ESTATE LAW, LLC, and specifically admits, denies and/or responds to the allegations of SHARATH CHANDRA, Administrator, REAL ESTATE DIVISION, DEPARTMENT OF BUSINESS & INDUSTRY, STATE OF NEVADA's ("Petitioner's") Complaint as follows:

Respondent does not contest the Division's jurisdiction over this matter.

FACTUAL ALLEGATIONS

1. Respondent admits the allegations in Paragraph 1 of Petitioner's Complaint.
2. Respondent denies the allegations in Paragraph 2 of Petitioner's Complaint.
3. Respondent admits the allegations in Paragraph 3 of Petitioner's Complaint.
4. Respondent denies the allegations in Paragraph 4 of Petitioner's Complaint.

1 5. Respondent denies the allegations in Paragraph 5 of Petitioner's Complaint.

2 6. Respondent admits the allegations in Paragraph 6 of Petitioner's Complaint.

3 7. Respondent admits the allegations in Paragraph 7 of Petitioner's Complaint.

4 **ALLEGED VIOLATIONS**

5 8. Respondent denies the allegations in Paragraph 8 of Petitioner's Complaint.

6 9. Respondent denies the allegations in Paragraph 9 of Petitioner's Complaint.

7 10. Respondent denies the allegations in Paragraph 10 of Petitioner's Complaint.

8 Respondent admits that the Division's is authorized to discipline him regarding this
9 matter, but asserts that the disciplinary measures sought by the division are unwarranted and/or
10 excessive.

11 Respondent, JULES MITCHELL LEHR, by and through his attorney, KATHRYN
12 HOLBERT, Esq. of NEVADA REAL ESTATE LAW, LLC., having fully and specifically
13 responded to each and every allegation set forth in Petitioner's Complaint, now asserts the
14 following:

15 **AFFIRMATIVE DEFENSES**

16 **FIRST AFFIRMATIVE DEFENSE**

17 Petitioner's Complaint fails to state a claim for which relief can be granted as against this
18 Respondent.

19 **SECOND AFFIRMATIVE DEFENSE**

20 Respondent generally denies all allegations of wrongdoing.

21 **THIRD AFFIRMATIVE DEFENSE**

22 Any allegations or factual matters asserted by Petitioner that are not specifically admitted
23 are hereby denied.

24 **WHEREFORE**, all material allegations of Petitioner's Complaint having been denied
25 and affirmative defenses having been asserted, Respondent hereby requests as follows:

26 1. That Petitioner's Complaint be dismissed;

27 And
28

1 2. For such other and further relief as the Commission may deem just and proper.

2 Dated this 23rd day of February, 2021. NEVADA REAL ESTATE LAW

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by: Kath Holbert

KATHRYN HOLBERT, ESQ.

Nevada Bar No. 10084

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kathryn@NVRElaw.com

Attorney for Respondent
JULES MITCHELL LEHR

1 **CERTIFICATE OF SERVICE and/or MAILING**

2 I hereby certify that on the 23rd day of February, 2021, I caused to be served a true copy
3 of the following document(s):

4 **ANSWER TO PETITIONER'S COMPLAINT FILED BY**
5 **RESPONDENT JULES MITCHELL LEHR**

6 to be served on the following.

7 Evelyn Pettee
8 Commission Coordinator
9 epattee@red.nv.gov

Karissa D. Neff, Esq.
Senior Deputy Attorney General
kneff@ag.nv.gov

By:

10 ☒ **ELECTRONIC SERVICE:** Said document(s) was served electronically upon all eligible
11 electronic recipients via Eighth Judicial District Court e-filing system and/or via email.

12 ☐ **U.S. MAIL:** I deposited a true and correct copy of said document(s) in a sealed, postage
13 prepaid envelope, in the United States Mail, to those parties which were not on the Court's
14 electronic service list.

15 ☐ **FACSIMILE:** I caused said document(s) to be transmitted by facsimile transmission. The
16 sending facsimile machine properly issued a transmission report confirming that the
17 transmission was complete and without error.

18 ☐ **OVERNIGHT MAIL:** I caused said document(s) to be deposited in a box or other facility
19 regularly maintained by an express service carrier providing overnight delivery in an envelope
20 or package designated by the express service carrier with delivery fees paid or provided.

21 Dated this 23rd day of February, 2021. NEVADA REAL ESTATE LAW

22 by: Kathryn Holbert
23 KATHRYN HOLBERT, ESQ.
24 Nevada Bar No. 10084
25 NEVADA REAL ESTATE LAW
26 9708 Gilespe St., Bldg A, Suite 112
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Attorney for Respondent
JULES MITCHELL LEHR