

**FILED**

FEB 24 2021

REAL ESTATE COMMISSION

BY *Kathryn Holbert*

1 ANS  
 2 KATHRYN HOLBERT, ESQ.  
 Nevada Bar No. 10084  
 3 NEVADA REAL ESTATE LAW, LLC  
 9708 Gilespe St., Bldg A, Suite 112  
 Telephone: (702) 429-1614  
 4 [kathryn@NVRElaw.com](mailto:kathryn@NVRElaw.com)  
 Attorney for Respondent  
 5 JULES MITCHELL LEHR

6 **BEFORE THE REAL ESTATE COMMISSION**  
 7 **STATE OF NEVADA**

8 SHARATH CHANDRA, Administrator, ) Case No.: 2019-521  
 9 REAL ESTATE DIVISION, )  
 10 DEPARTMENT OF BUSINESS & )  
 INDUSTRY, STATE OF NEVADA )  
 11 ) **ANSWER TO PETITIONER'S COMPLAINT**  
 Petitioner, ) **FILED BY RESPONDENT**  
 12 vs. ) **JULES MITCHELL LEHR**  
 )  
 13 JULES MITCHELL LEHR, )  
 )  
 14 Defendants. )  
 15 )

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

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

22 **FACTUAL ALLEGATIONS**

- 23
- 24 1. Respondent admits the allegations in Paragraph 1 of Petitioner's Complaint.
  - 25 2. Respondent admits the allegations in Paragraph 2 of Petitioner's Complaint.
  - 26 3. Respondent admits the allegations in Paragraph 3 of Petitioner's Complaint.
  - 27 4. Respondent denies the allegations in Paragraph 4 of Petitioner's Complaint.
- 28

- 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 7a. Respondent denies the allegations in Paragraph 7a of Petitioner’s Complaint.  
4 7b. Respondent denies the allegations in Paragraph 7b of Petitioner’s Complaint.  
5 7c. Respondent denies the allegations in Paragraph 7c of Petitioner’s Complaint.  
6 7d. Respondent denies the allegations in Paragraph 7d of Petitioner’s Complaint.  
7 7e. Respondent admits the allegations in Paragraph 7e of Petitioner’s Complaint.  
8 8. Respondent denies the allegations in Paragraph 8 of Petitioner’s Complaint.  
9 9. Respondent denies the allegations in Paragraph 9 of Petitioner’s Complaint.  
10 10. Respondent denies the allegations in Paragraph 10 of Petitioner’s Complaint.

11 **ALLEGED VIOLATIONS**

- 12 11. Respondent denies the allegations in Paragraph 11 of Petitioner’s Complaint.  
13 12. Respondent denies the allegations in Paragraph 12 of Petitioner’s Complaint.  
14 13. Respondent denies the allegations in Paragraph 13 of Petitioner’s Complaint.  
15 14. Respondent denies the allegations in Paragraph 14 of Petitioner’s Complaint.  
16 15. Respondent denies the allegations in Paragraph 15 of Petitioner’s Complaint.

17 Respondent admits that the Division’s is authorized to discipline him regarding this  
18 matter, but asserts that the disciplinary measures sought by the division are unwarranted and/or  
19 excessive.

20 Respondent, JULES MITCHELL LEHR, by and through his attorney, KATHRYN  
21 HOLBERT, Esq. of NEVADA REAL ESTATE LAW, LLC., having fully and specifically  
22 responded to each and every allegation set forth in Petitioner’s Complaint, now asserts the  
23 following:

24 **AFFIRMATIVE DEFENSES**

25 **FIRST AFFIRMATIVE DEFENSE**

26 Petitioner’s Complaint fails to state a claim for which relief can be granted as against this  
27 Respondent.

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**SECOND AFFIRMATIVE DEFENSE**

Respondent generally denies all allegations of wrongdoing.

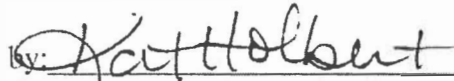
**THIRD AFFIRMATIVE DEFENSE**

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

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

1. That Petitioner’s Complaint be dismissed;
- and
2. For such other and further relief as the Commission may deem just and proper.

Dated this 23<sup>rd</sup> day of February, 2021. NEVADA REAL ESTATE LAW

  
\_\_\_\_\_  
KATHRYN HOLBERT, ESQ.  
Nevada Bar No. 10084  
NEVADA REAL ESTATE LAW  
9708 Gilespe St., Bldg A. Suite 112  
Telephone: (702) 429-1614  
[kathryn@NVRElaw.com](mailto:kathryn@NVRElaw.com)

Attorney for Respondent  
JULES MITCHELL LEHR

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**CERTIFICATE OF SERVICE and/or MAILING**

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

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

to be served on the following,

Evelyn Pettec  
Commission Coordinator  
[epattee@red.nv.gov](mailto:epattee@red.nv.gov)

Karissa D. Neff, Esq.  
Senior Deputy Attorney General  
[kneff@ag.nv.gov](mailto:kneff@ag.nv.gov)

By:

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

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

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

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

Dated this 23<sup>rd</sup> day of February, 2021. NEVADA REAL ESTATE LAW

by: Kathryn Holbert  
KATHRYN HOLBERT, ESQ.  
Nevada Bar No. 10084  
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9708 Gilespe St., Bldg A, Suite 112  
Telephone: (702) 429-1614  
[kathryn@NVRElaw.com](mailto:kathryn@NVRElaw.com)

Attorney for Respondent  
JULES MITCHELL LEHR