

FILED

FEB 24 2021

REAL ESTATE COMMISSION

BY *Kathryn Holbert*

ANS
KATHRYN HOLBERT, ESQ.
Nevada Bar No. 10084
NEVADA REAL ESTATE LAW, LLC
9708 Gillespie St., Bldg A, Suite 112
Telephone: (702) 429-1614
kathryn@NVRElaw.com
Attorney for Respondent
JULES MITCHELL LEHR

BEFORE THE REAL ESTATE COMMISSION
STATE OF NEVADA

SHARATH CHANDRA, Administrator,) Case No.: 2019-521
REAL ESTATE DIVISION,)
DEPARTMENT OF BUSINESS &)
INDUSTRY, STATE OF NEVADA)

Petitioner,)

vs.)

JULES MITCHELL LEHR,)

Defendants.)

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

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 admits 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.

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

ALLEGED VIOLATIONS

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

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

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

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

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

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 Pettec
8 Commission Coordinator
9 epattee@red.nv.gov

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

By:

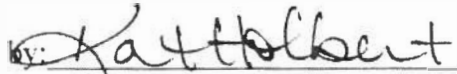
10 ☒ **ELECTRONIC SERVICE:** Said document(s) was served electronically upon all eligible
11 electronic recipients via Eighth Judicial District Court e-filing system and/or via email.

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 
23 KATHRYN HOLBERT, ESQ.
24 Nevada Bar No. 10084
25 NEVADA REAL ESTATE LAW
26 9708 Gillespie St., Bldg A, Suite 112
27 Telephone: (702) 429-1614
28 kathryn@NVRElaw.com

Attorney for Respondent
JULES MITCHELL LEHR