1 2 3 4 5	ANS KATHRYN HOLBERT, ESQ. Nevada Bar No. 10084 NEVADA REAL ESTATE LAW, LLC 9708 Gilespie St., Bldg A, Suite 112 Telephone: (702) 429-1614 kathryn@NVRElaw.com Attorney for Respondent JULES MITCHELL LEHR		
6 7	BEFORE THE REAL ESTATE COMMISSION		
8	STATE OF NEVADA		
9	SHARATH CHANDRA, Administrator,) Case No.: 2019-521 REAL ESTATE DIVISION,)		
10	DEPARTMENT OF BUSINESS &) INDUSTRY, STATE OF NEVADA)		
Ц	Petitioner,ANSWER TO PETITIONER'S COMPLAINTPetitioner,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 23	FACTUAL ALLEGATIONS		
25 24	 Respondent admits the allegations in Paragraph 1 of Petitioner's Complaint. 		
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26	2. Respondent admits the allegations in Paragraph 2 of Petitioner's Complaint.		
27	3. Respondent admits the allegations in Paragraph 3 of Petitioner's Complaint.		
28	4. Respondent denies the allegations in Paragraph 4 of Petitioner's Complaint.		
20	<i>NRED v. Lehr</i> Case No., 2019-521 ANSWER TO PETITIONER'S COMPLAINT FILED BY REPONDENT JULES MITCHFULLEHR Page 1 of 4		

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	Respo	ondent 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	Respo	ondent, 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	Petiti	oner's Complaint fails to state a claim for which relief can be granted as against this		
27	Respondent.			
28				
		MRED v. Lehr Case No.: 2019-521 ANSWER TO PETITIONER'S COMPLAINT FILLED BY REPONDENT JULES MITCHELLEFTR Page 2 of 4		

1	SECOND AFFIRMATIVE DEFENSE
2	Respondent generally denies all allegations of wrongdoing.
3	THIRD AFFIRMATIVE DEFENSE
4	Any allegations or factual matters asserted by Petitioner that are not specifically admitted
5	are hereby denied.
6	WHEREFORE, all material allegations of Petitioner's Complaint having been denied
7	and affirmative defenses having been asserted, Respondent hereby requests as follows:
8	1. That Petitioner's Complaint be dismissed;
9	and
10	2. For such other and further relief as the Commission may deem just and proper.
11	Dated this day of formery, 2021. NEVADA REAL ESTATE LAW
12	$\sim 2 110 \text{GL}$
13	KATHRYN HOLBERT, ESQ.
14	Nevada Bar No. 10084 NEVADA REAL ESTATE LAW
15	9708 Gilespie St., Bldg A, Suite 112 Telephone: (702) 429-1614
16	kathryn@NVRElaw.com
17	Attorney for Respondent JULES MITCHELL LEHR
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20	NRED v. Lehr – Case No.: 2019-521 ANSWER TO PETITIONER'S COMPLAINT FILED BY REPONDENT JULES METCHELL LEHR Page 3 of 4

1	CERTFICATE OF SERVICE and/or MAILING
2	I hereby certify that on the 23 rd 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 PetteeKarissa D. Neff, Esq.Commission CoordinatorSenior Deputy Attorney Generalepattee@red.nv.govkneff@ag.nv.gov
9	By:
10	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.
11 12	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.
13 14	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.
15 16	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.
17 18	Dated this 23 day of February, 2021. NEVADA REAL ESTATE LAW
19	
20	KATHRYN HOLBERT, ESQ.
21	Nevada Bar No. 10084
22	NEVADA REAL ESTATE LAW 9708 Gilespie St., Bldg A. Suite 112
23	Telephone: (702) 429-1614 kathryn@NVRElaw.com
24	Attorney for Respondent
25	JULES MITCHELL LEHR
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	NRED v. Lehr – Case No.: 2019-521 ANSWER TO PETITIONER'S COMPLAINT FILED BY REPONDENT JULES METCHELL LEHR Page 4 of 4