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REAL ESTATE COMMISSION

BY Kelley Valaden

Dept of Business & Industry
Real Estate Division - LV MAIL

1 ANSWER
 2 NICHOLAS M. WOOLDRIDGE
 3 Nevada State Bar No. 8732
 4 WOOLDRIDGE LAW, LTD.
 5 400 S. 7th Street
 6 Las Vegas, NV 89101
 Telephone: (702) 330-4645
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 Attorney for Kenneth Calder

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

10 SHARATH CHANDRA, Administrator,
 11 REAL ESTATE DIVISION,
 12 DEPARTMENT OF BUSINESS &
 13 INDUSTRY, STATE OF NEVADA,

Case No.: 2021-1227

Petitioner,

vs.

16 KENNETH CALDER

Respondent.

19 **RESPONDENT KENNETH CALDER'S ANSWER TO THE COMPLAINT**

20 Respondent, KENNETH CALDER, through my attorney NICHOLAS M.
 21 WOOLDRIDGE of WOOLDRIDGE LAW LTD., answers the Complaint as follows:
 22

- 23 1. Kenneth Calder admits the allegations contained in paragraphs 1, 2, 3, 4, 5, 6, 7,
 24 9, 11, 12, 14, 16, 17, 21, 25, 26, 27, 28, and 29.
 25 2. As to paragraph number 8, Kenneth Calder admits that these are the
 26 complainant's allegations, but denies that the allegations are true. All statements to the
 27 Complainant are accessible via the App Folio Owner Portal where statements are
 28

1 available to landlords to download. Payments were made in varying amounts to the
2 Complainant because costs associated with management changed sometime monthly
3 with vendor billing. The owner statements were available on the portal.

4
5 3. As to paragraph 10, Mr. Calder admits that these are the complainant's
6 allegations, but denies that the allegations are true.

7
8 4. As to paragraph 13, Mr. Calder admits, however, for context purposes, at this time
9 the Respondent believed that the matter had been resolved as the billing and the security
10 deposit was caused to be turned a while before the January 4, 2022 letter.

11
12 5. As to paragraph 15, Mr. Calder admits that the letter was sent, but denies the date
13 to respond.

14
15 6. As to paragraph 18, Mr. Calder admits this is the complainant's allegation, but
16 denies that she failed to receive 1099s.

17
18 7. As to paragraphs 19, and 20 Mr. Calder admits these are the allegations of the
19 complainant, but denies the truth of the allegations.

20
21 8. As to paragraphs 22, 23, and 24 Mr. Calder admits that these are the allegations of
22 Turnkey, but denies the truth of the allegations.

23
24 9. As to paragraph 30, Mr. Calder admits the allegation, but for purposes of context
25 he believed the matter was resolved, and the communications were crossed.

26
27 10. As to paragraphs 31, 32, and 36, Mr. Calder denies the allegations.

28
AFFIRMATIVE DEFENSES

1. Good Faith: Respondent acted in good faith while dealing with Complainant.
2. Complete Performance: The Respondent complied with his obligations to the Complainant.

1 **PRAYERS FOR RELIEF**

2 WHEREFORE, The Respondent prays for relief as follows:

- 3 1. The Division takes nothing by way of the Complaint.
4
5 2. The Division's Complaint be dismissed with prejudice.
6
7 3. For such other and further relief as the Commission deems appropriate and fair.

7 DATED this 25th day of October, 2022.

KENNETH CALDER

8 by his attorney,

9 */s/ Nicholas Wooldridge*

10 Nicholas M. Wooldridge, Esq.

11 Wooldridge Law Ltd.

12 400 S. 7th Street Las Vegas, NV 89101

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14 (702) 330-4645 Tel.

(702) 359-8494 Fax.

15 **CERTIFICATE OF SERVICE**

16 I confirm that on this 25th day of October, 2022, a copy of the foregoing Answer was
17 sent electronically to the following addresses as well as sent via first class mail:

18 Real Estate Division
19 State of Nevada
20 3300 W. Sahara Ave. Suite 350
21 Las Vegas, NV 89102
22 Attn: Commission Coordinator
23 sbates@red.nv.gov

24 Karissa D. Neff
25 Senior Deputy Attorney General
26 555 E. Washington Ave. Ste. 3900
27 Las Vegas, NV 89101
28 kneff@ag.nv.gov

/s/ Melody Phommaly

An Employee of Wooldridge Law