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FEB 18 2022

REAL ESTATE COMMISSION

BY *Emily Patten*

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

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

2018
Case No.: 2021-326

13 vs. Petitioner,
14 YERANUHI AREKELYAN,
15 Respondent.

ANSWER TO COMPLAINT

16
17 COMES NOW the Respondent, YERANUHI AREKELYAN, by and through her attorney,
18 GUS W. FLANGAS, ESQ. of the FLANGAS LAW GROUP, and hereby answers the Complaint as
19 follows:

20 **JURISDICTION**

- 21 1. Respondent admits the allegations contained in Paragraph one.

22 **FACTUAL ALLEGATIONS**

- 23 2. Respondent admits the allegations contained in Paragraph two.
24 3. Respondent admits the allegations contained in Paragraph three.
25 4. Respondent admits the allegations contained in Paragraph four.
26 5. Respondent denies the allegations contained in Paragraph five in that she does
27 not have sufficient knowledge or information upon which to base a belief as to the truth of the
28 allegations contained therein.

1 6. Respondent denies the allegations contained in Paragraph six in that she does not
2 have sufficient knowledge or information upon which to base a belief as to the truth of the
3 allegations contained therein.

4 7. Respondent denies the allegations contained in Paragraph seven in that she does
5 not have sufficient knowledge or information upon which to base a belief as to the truth of the
6 allegations contained therein.

7 8. Respondent only admits that Complainant's property management agreement was
8 terminated; Respondent denies the remaining allegations contained in Paragraph eight.

9 9. Respondent admits the allegations contained in Paragraph nine.

10 10. Respondent denies the allegations contained in Paragraph nine.

11 11. Respondent denies the allegations contained in Paragraph eleven in that she does
12 not have sufficient knowledge or information upon which to base a belief as to the truth of the
13 allegations contained therein.

14 12. Respondent admits the allegations contained in Paragraph twelve.

15 13. Respondent denies the allegations contained in Paragraph thirteen in that she does
16 not have sufficient knowledge or information upon which to base a belief as to the truth of the
17 allegations contained therein.

18 14. Respondent admits the allegations contained in Paragraph fourteen.

19 15. Respondent admits the allegations contained in Paragraph fifteen.

20 16. Respondent denies the allegations contained in Paragraph sixteen.

21 17. Respondent denies the allegations contained in Paragraph seventeen; and
22 specifically denies that she did not hold security deposits.

23 18. Respondent denies the allegations contained in Paragraph eighteen.

24 19. Respondent denies the allegations contained in Paragraph nineteen in that she did
25 not hold trust deposits.

26 20. Respondent denies the allegations contained in Paragraph twenty.

27 21. Respondent denies the allegations contained in Paragraph twenty one.

28 22. Respondent denies the allegations contained in Paragraph twenty two in that she

1 does not have sufficient knowledge or information upon which to base a belief as to the truth of
2 the allegations contained therein.

3 23. Respondent admits the allegations contained in Paragraph twenty three.

4 24. Respondent admits the allegations contained in Paragraph twenty four.

5 25. Respondent admits the allegations contained in Paragraph twenty five, in that the
6 security deposits were passed through to the owners.

7 26. Respondent denies the allegations contained in Paragraph twenty six in that the
8 account is an owner's trust account, and is closed.

9 27. Respondent answers the allegations contained in Paragraph twenty seven stating
10 that the checking account ending in 7464 is an overhead/business account, the account ending in
11 3579 was an overhead/business account, and was closed in 2019, and the account ending in 3587
12 was a Broker/Escrow Account and was closed in 2019.

13 28. Respondent denies the allegations contained in Paragraph twenty eight.

14 29. Respondent denies the allegations contained in Paragraph twenty nine, in that the
15 amounts varied.

16 30. Respondent denies the allegations contained in Paragraph thirty.

17 31. Respondent denies the allegations contained in Paragraph thirty one.

18 32. Respondent denies the allegations contained in Paragraph thirty two.

19 33. Respondent denies the allegations contained in Paragraph thirty three.

20 34. Respondent denies the allegations contained in Paragraph thirty four.

21 35. Respondent denies the allegations contained in Paragraph thirty five.

22 36. Respondent admits the allegations contained in Paragraph thirty six, but believed
23 the matter was done.

24 **VIOLATIONS OF LAW**

25 1. Respondent denies the allegations contained in Paragraph one.

26 2. Respondent denies the allegations contained in Paragraph two.

27 3. Respondent denies the allegations contained in Paragraph three.

28 4. Respondent denies the allegations contained in Paragraph four.

1 Respondent requests an award of substantial attorneys fees and costs.

2 **SEVENTH AFFIRMATIVE DEFENSE**

3 Respondent denies each and every allegation contained in the Complaint not otherwise
4 specifically admitted or denied.

5 **EIGHTH AFFIRMATIVE DEFENSE**

6 All possible affirmative defenses may not have been alleged herein as so far as
7 sufficient facts were not available after reasonable inquiry upon filing of Respondent's Answer
8 and, therefore Respondent reserves the right to amend her Answer to allege additional affirmative
9 defenses if subsequent investigation warrants.

10 WHEREFORE, Respondent prays for judgment as follows:

- 11 1. That Petitioner take nothing by way of its Complaint on file herein, and that the
12 same be dismissed with prejudice;
- 13 2. That Respondent be awarded her attorneys' fees and costs for having to defend
14 this action;
- 15 3. For such other and further relief as the Commission may deem just and proper.

16 DATED this 17th day of February, 2022.

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