

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

SHARATH CHANDRA, Administrator,
REAL ESTATE DIVISION, DEPARTMENT
OF BUSINESS & INDUSTRY,
STATE OF NEVADA,

)
) **Case No. 2022-339**
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Petitioner,

vs.

KEA RANA,

Respondent.

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FILED

OCT 06 2022

REAL ESTATE COMMISSION
BY 

RESPONDENT'S ANSWER TO COMPLAINT

COMES NOW, KEA RANA, "Respondent", and files this Respondent's Answer to Complaint.

RESPONSES TO FACTUAL ALLEGATIONS

Answering paragraphs 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 16, 17, 22, 25, 26, 27, 28, 29, 30, 31, 32, 33, 35, 40, 41, 42, 43, 48, 49, 50, 51, 53, 54, 55, 58, 59, 60, 62, 64, 65, 67, 68, 69, 71, 74, 75, 76, 77, 78, 81, 83, 84, 85, 87, 88, 90, 91, 92, 93, 94, 95, 100, 101, 102, 109, 113, 114, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 140, 141, 142, 143, 144, and 145 of the Complaint on file herein, Respondent **admits** each allegation contained therein.

Answering paragraphs 103, 104, 111, and 139 of the Complaint on file herein, Respondent **denies** each allegation contained therein.

Answering paragraphs 8, 18, 19, 20, 21, 23, 24, 34, 36, 37, 38, 39, 44, 45, 46, 47, 52, 56, 57, 61, 63, 70, 72, 73, 79, 80, 82, 86, 89, 96, 97, 98, 99, 105, 106, 107, 108, 110, 112, 115, 116, 117, and 118 of the Complaint on file herein, Respondent states that she is **without sufficient knowledge** or

1 information to form an opinion as to the complete truth or veracity of the allegations contained therein
2 and therefore denies each paragraph in its entirety.

3 **RESPONSES TO ALLEGED VIOLATIONS OF LAW**

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5 1. Answering the alleged violations 1, 2, 3, 4, 5, 6, and 7 of the Complaint on file herein,
6 Respondent denies any wrongdoing that warrants any type of discipline.

7 **RESPONSES TO DISCIPLINE AUTHORIZED**

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9 2. Responding to paragraphs 1, 2, and 3 of the Discipline Authorized noted in the Complaint
10 on file herein, Respondent asserts that they are mere statements, legal or otherwise, and not allegations
11 requiring a response from this Respondent.

12 WHEREFORE, Respondent prays that this Commission deny the relief requested and dismisses
13 this Complaint with prejudice.

14
15 Dated this 5th day of October 2022.

16 Respectfully Submitted by:

17 **WILDE & ASSOCIATES, LLC.**

18 */S/ Gregory Wilde*

19 **Gregory L. Wilde, Esq.**

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