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FILED

SEP 25 2023

REAL ESTATE COMMISSION
BY Kelly Valadez

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

9 SHARATH CHANDRA, Administrator,) Case No.: 2020-632
10 REAL ESTATE DIVISION, DEPARTMENT)
11 OF BUSINESS AND INDUSTRY, STATE)
12 OF NEVADA,)
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Petitioner,

vs.

JOHN E. GRANT,

Respondent.

ANSWER

Respondent JOHN E. GRANT, an individual ("*Respondent*" or "*Grant*"), hereby submits his Answer to the Complaint filed on July 20, 2023, as follows:

JURISDICTION

Respondent admits he was licensed as a Nevada real estate broker (B.0038561.CORP) until expiration on January 31, 2023, but is without knowledge or information sufficient to form a belief as to the truth of whether the Division and Commission have jurisdiction over this matter.

FACTUAL ALLEGATIONS

1. Answering paragraph 1, Respondent admits only that he held a valid and active Nevada real estate broker license (B.0038561.CORP) until expiration on January 31, 2023, but denies the remaining allegations contained therein.

1 2. Answering paragraph 2, Respondent is without knowledge or information
2 sufficient to form a belief as to the truth of the allegations contained therein, including what
3 LaMay may have provided to the Division.

4 3. Answering paragraph 3, Respondent admits only that the electronic advertisement
5 referenced therein speaks for itself.

6 4. Answering paragraph 4, Respondent admits that Sheedy inadvertently allowed his
7 salesperson license to expire.

8 5. Answering paragraph 5, Respondent is without knowledge or information
9 sufficient to form a belief as to the truth of the allegations contained therein, including what the
10 Division's investigation may have revealed.

11 6. Answering paragraphs 6 through 9, Respondent admits only that the
12 advertisements on the Park Brokerage, Inc. website speak for themselves.

13 7. Answering paragraph 10, Respondent admits only that the letter referenced
14 therein speaks for itself.

15 8. Answering paragraph 11, Respondent admits only that his response referenced
16 therein speaks for itself.

17 9. Answering paragraph 12, Respondent is without knowledge or information
18 sufficient to form a belief as to the truth of the allegations contained therein.

19 10. Answering paragraph 13, Respondent admits that the documents he signed and
20 produced in response to the request for his files speak for themselves.

21 11. Answering paragraphs 14 through 17, Respondent is without knowledge or
22 information sufficient to form a belief as to the truth of the allegations contained therein,
23 including what the Division has or has not found in the documents.

24 12. Answering paragraph 18, Respondent admits only that the Purchase and Sale
25 Agreement with Escrow instructions referenced therein, as later amended by a 1st Amendment,
26 speaks for itself.

1 5. Respondent John Grant, as broker of record, received the commissions for these
2 three transactions.

3 6. Respondent John Grant and John Sheedy are in a broker/salesperson relationship
4 as licensees in the State of Arizona and State of California and were in such a relationship during
5 all relevant times alleged in the Complaint.

6 7. Respondent John Grant and John Sheedy were in a broker/salesperson
7 relationship in Nevada but John Sheedy inadvertently allowed his license in Nevada to expire.

8 8. NRS Chapter 645 regulates the practice of real estate professionals to protect
9 property owners and the general public.

10 9. The purchase and sale of mobile home and RV parks is highly specialized and
11 there is a national demand for services of Respondent John Grant and John Sheedy in locations
12 throughout the United States.

13 10. Respondent John Grant and John Sheedy have always acted in accordance with
14 their duties to the clients under their broker/salesperson relationship regardless of the state in
15 which they have provided services in this specialized market.

16 11. None of the clients represented by Respondent John Grant suffered harm in the
17 three transactions and, to the contrary, are highly satisfied with the brokerage services provided.

18 12. None of the buyers of the properties in the three transactions suffered harm and,
19 to the contrary, are highly satisfied with their purchases.

20 WHEREFORE, Respondent respectfully requests the following relief:

- 21 1. That the Complaint on file herein be dismissed with prejudice; and
22 2. For such other and further relief as the Commission may deem just and proper.

23 Dated this 25th day of September, 2023.

24 MAUPIN, COX & LEGOY

25 By: 

26 Rick R. Hsu, No. 5374
 Attorneys for Respondent
 John E. Grant

