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FILED

AUG 17 2023

REAL ESTATE COMMISSION

BY Kelley Valadez

7 BEFORE THE REAL ESTATE COMMISSION

8 STATE OF NEVADA

9
10 SHARATH CHANDRA, Administrator REAL
ESTATE DIVISION, DEPARTMENT OF
11 BUSINESS & INDUSTRY, STATE OF
NEVADA

CASE NO.: 2022-133

12 Petitioner,

13 vs.

14 IYAD HADDAD

15 Respondent

16 **ANSWER**

17 Respondent, by and through it's attorney, Michael F. Bohn, Esq., answers the plaintiffs'
18 complaint as follows:

- 19
- 20 1. Respondent admits the allegations contained in paragraphs 1, 2, 4, 5, 6, 7, 8, 9,
 - 21 2. Respondent denies the allegations contained in paragraphs 3, 10, 11, 12, 13, 14, 15, 16,
22 17, 18 and 19.

23 **AFFIRMATIVE DEFENSES**

24 Respondent states that the sanction was issued in violation of the respondent's due process rights.
25 Respondent was served with a complaint which failed to name the respondent or cite to any statute or
26 code section which was allegedly violated.

27 Respondent also has evidence to dispute the claims of the tenant, including that the repair work
28 was ordered and completed before the tenant took possession of the property, that the tenant failed to

1 contact the utility companies to have service initiated, that the tenant prevented repairs and that the tenant
2 intentionally damaged the property after taking possession.

3 DATED this 17th day of August 2023.

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7 By: /s/ Michael F. Bohn, Esq./
8 MICHAEL F. BOHN, ESQ.
9 2260 Corporate Circle, Suite 480,
10 Henderson, Nevada 89074
11 Attorneys for Iyad Haddad

12 **CERTIFICATE OF SERVICE**

13 I certified that the foregoing answer was served on August 17, 2023 by email to the following:

14 Phil W. Su
psu@ag.nv.gov

15 Kelly Valadez
kvaladez@red.nv.gov

16
17 /s/ Michael F. Bohn, Esq. /