

FILED

OCT 18 2023

REAL ESTATE COMMISSION

BY Kelly Valadez

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3 Las Vegas, NV 89149
4 (702) 803-0155
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6 Pro Se Respondent

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8 **BEFORE THE REAL ESTATE COMMISSION**

9 **STATE OF NEVADA**

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

Case No.: 2023-216

14 vs.

ANSWER TO COMPLAINT

15 EILEEN PRUDHONT,
16 (B.1001931.LLC)

17 Respondent.

18 Respondent Eileen Prudhont hereby files his Answer to Petitioner's Complaint, as follows:

19 **JURISDICTION**

20 No response by Respondent is required as all paragraphs cite the applicable law.

21 **FACTUAL ALLEGATIONS**

22 1. As to Paragraphs 1, 2, 4, 9, 10, 11, and 12 of Petitioner's Complaint, Respondent admits to the
23 allegations contained herein.

24 2. As to Paragraphs 3, 5, 6, 7, 8, and 13 of Petitioner's Complaint, Respondent Defendant does
25 not know or have enough information to form a belief as to whether the allegations are true.

26 3. Any other allegations not specifically responded to were inadvertently omitted and are further
27 denied.

28 **VIOLATIONS OF THE LAW**

1. As to Paragraph 1 and 2, of Petitioner's Complaint, Respondent admits to the allegations.

1 **AFFIRMATIVE DEFENSE**

2 **First Affirmative Defense**

3 Since 2017, all fees requested to be paid by The Division have been paid promptly as
4 requested or required by law, including during the complaint period in-person to Amy Reveyrand on
5 May 15, 2023, of \$80.00 for the address change from 2850 W. Horizon Ridge Parkway, Ste. 200,
6 Henderson, NV to 1050 E. Flamingo #S107, Las Vegas, Nevada, and for \$40.00 and \$40.00 for the
7 address change from the Flamingo address to 5510 Fort Apache #451, Las Vegas, NV on or around
8 June 2, 2023 and cashed by The Department on or around June 14, 2023.

9 **Second Affirmative Defense**

10 On May 23, 2023, Respondent filed and delivered in person Respondent's completed 546A
11 form to The Division employee Amy Reveyrand. Amy Reveyrand accepted the form 546A and
12 Respondent asked Amy Reveyrand if any payments were due. Amy Reveyrand advised Respondent
13 that no payments were due. If Respondent was advised that any fees were due, Respondent was
14 prepared and willing to pay any unpaid fees to Amy Reveyrand at that time, however, Amy
15 Reveyrand's response indicated that any fees and penalties had been waived by The Department.

16 **Third Affirmative Defense**

17 Petitioner has suffered no legal damages.

18 **Fourth Affirmative Defense**

19 Respondent's business address moved during the allegation period three times and
20 Petitioner's complaint was not received by Respondent until the complaint was emailed to
21 Respondent's business email address. Once Respondent was notified of Petitioner's complaint by
22 email, Respondent filed Respondent's form 546A, and paid all fees that Respondent was advised were
23 due.

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25 **PRAYER FOR RELIEF**

- 26 1. That it be held that Respondent has committed no violations.
27 2. That no penalties be imposed upon Respondent.
28 3. That no damages be imposed upon Respondent.

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- 4. That Petitioner take nothing by reason of its Complaint.
- 5. That the Complaint be dismissed.
- 6. For any other relief that this Commission deems just and proper.

Respectfully Submitted,

Dated this 18th of October, 2023

Signature: Eileen Prudhont

Eileen Prudhont

Pro Se Respondent