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FILED
OCT 18 2023
REAL ESTATE COMMISSION
BY *Kelley Valadez*

6 Pro Se Respondent

7
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.: 2023-217

14 vs.

ANSWER TO COMPLAINT

15 JOHN PRUDHONT,
16 (B.1001930.LLC)

17 Respondent.

18 Respondent John 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, 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, 9, 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, Eileen Prudhont, wife of Respondent and a concurrent broker for The
11 Business Brokers LLC with Respondent filed and delivered in person Respondent's completed 546A
12 form to The Division employee Amy Reveyrand. Amy Reveyrand accepted the form 546A and Eileen
13 Prudhont asked Amy Reveyrand if any payments were due. Amy Reveyrand advised Eileen Prudhont
14 that no payments were due. If Eileen Prudhont was advised that any fees were due, Eileen Prudhont
15 was prepared and willing to pay any unpaid fees to Amy Reveyrand at that time, however, Amy
16 Reveyrand's response indicated that any fees and penalties had been waived by The Department.

17 **Third Affirmative Defense**

18 Petitioner has suffered no legal damages.

19 **Fourth Affirmative Defense**

20 Respondent has suffered health issues, including Gout attacks, Gout-associated foot surgery
21 and recovery, Esophagitis, and Esophagitis surgeries and recovery requiring him to delegate daily
22 interactions with The Department to Eileen Prudhont during the allegation period.

23 **Fifth Affirmative Defense**

24 Respondent's business address moved during the allegation period three times and
25 Petitioner's complaint was not received by Respondent until the complaint was emailed to
26 Respondent's business email address. Once Respondent was notified of Petitioner's complaint by
27 email, Respondent's wife and concurrent broker, Eileen Prudhont, filed Respondent's form 546A, and
28 paid all fees that Eileen Prudhont was advised were due.

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PRAYER FOR RELIEF

1. That it be held that Respondent has committed no violations.
2. That no penalties be imposed upon Respondent.
3. That no damages be imposed upon Respondent.
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: John Prudhont
John Prudhont

Pro Se Respondent