

# FEB 0 2 2024

February 1, 2024



Sharath Chandra; Real Estate Division, Department of Business & Industry, State of Nevada v. Michael Sloane

# Case No. 2021-1217

## **ANSWER TO COMPLAINT**

#### **FACTUAL ALLEGATIONS:**

- 1. Respondent admits Paragraph 1
- 2. Respondent admits in part Paragraph 2 but, denies in part, as Respondent's license was renewed in the summer of 2023
- 3. Respondent admits Paragraph 3
- 4. Respondent admits Paragraph 4
- 5. Respondent admits Paragraph 5
- 6. Paragraph 6 contains legal conclusions which cannot be admitted or denied by Respondent, as Respondent was not aware that he could not ask for funds from clients.
- 7. Respondent admits Paragraph 7
- 8. Respondent admits Paragraph 8
- 9. Respondent admits Paragraph 9
- 10. Respondent admits Paragraph 10
- 11. Respondents admits Paragraph 11
- 12. Respondents admits Paragraph 12
- 13. Paragraph 13 lacks sufficient information, Respondent admits to the allegation, and replied to Complainant's email question by explaining that escrow deposits are usually wired directly to escrow.
- 14. Respondent admits Paragraph 14
- 15. Respondent admits Paragraph 15

- 16. Respondent admits Paragraph 16
- 17. Respondent admits Paragraph 17
- 18. Respondent admits Paragraph 18
- 19. Paragraph 19 contains conclusions that cannot be admitted or denied by Respondent.
- 20. Respondent admits Paragraph 20
- 21. Respondent admits Paragraph 21
- 22. Respondent admits Paragraph 22
- 23. Respondent admits Paragraph 23
- 24. Respondent admits Paragraph 24
- 25. Respondent admits Paragraph 25
- 26. Respondent admits Paragraph 26
- 27. Respondent admits Paragraph 27
- 28. Respondent admits Paragraph 28
- 29. Respondent lacks sufficient information to admit or deny Paragraph 29.
- 30. Respondent admits Paragraph 30

### PRAYER FOR RELIEF:

## Respondent prays as follows:

1. The Court dismiss the Complaint based off of the responses above and that Respondent has acted in good faith at all times. Respondent's conduct was just, fair, with good cause, in good faith, and without malice, and was justified by legitimate purposes and done for legitimate reasons.