 WESTLEY U. VILLANUEVA, ESQ Nevada Bar No.: 8708 WUV FIRM, LLC G767 W. Tropicana Avenue, 2ND Floor Las Vegas, NV 89103 725-258-2988 wes@wuvfirm.com BEFORE THE REAL ESTATE COMMISSION STATE OF NEVADA SHARATH CHANDRA, Administrator, REAL ESTATE DIVISION, DEPARTMENT OF BUSINESS AND INDUSTRY, STATE OF NEVADA Petitioner, Vs. CHARLES F. BOWSHIER, (S.0036055) Respondent. ANSWER TO COMPLAINT Now comes Respondent, CHARLES F. BOWSHIER, by and through their at 	
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	torney
19 WESTLEY U. VILLANUEVA, ESQ. of WUV FIRM, LLC, submits the following A	inswer to
20 the Complaint filed by the REAL ESTATE DIVISION, DEPARTMENT OF BUSIN	ESS AND
21 INDUSTRY, STATE OF NEVADA.	
22 FACTUAL ALLEGATIONS	
23	
1. Answering Paragraph 1 through 14 of the Complaint, Respondent is v	vithout
sufficient knowledge or information to form a belief as to the truth of the allegation	
26 paragraph, and therefore denies the allegations of these Paragraphs.	
27	
28	

VIOLATION OF LAW

2. Answering Paragraph 1 through 3 of the Complaint, these paragraph call for a legal conclusion to which no response is required. To the extent that a response is required, Respondent denies the allegations of this Paragraph.

DISCIPLINE AUTHORIZED

3. Answering Paragraph 4 through 6 of the Complaint, these paragraph call for a legal conclusion to which no response is required. To the extent that a response is required, Respondent denies the allegations of this Paragraph.

AFFIRMATIVE DEFENSES

4 Respondent hereby incorporates by reference those affirmative defenses enumerated in NRCP 8 as though fully set forth herein, as applicable upon investigation. In the event further investigation or discovery reveals the applicability of any such defenses, Defendant(s) reserves the right to seek leave to amend this answer to more specifically assert any such defense. Such defenses are herein incorporated by reference for the specific purpose of not waiving any such defenses.

- Accord and Satisfaction.
- Assumption of Risk.
- Duress.
- Estoppel.
 - Failure of Consideration.
 - Fraud.
 - Laches.
 - Payment.
- 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

• •	- Release.
2	- Res Judicata.
3	
4	- Statute of Frauds.
5	- Statute of Limitations.
6	- Waiver.
7	DATED February 8, 2024
8	Respectfully submitted,
9	WUY FIRMELC
10	Westley U. Villanueva, Esq.
11	NV State Bar No 8708 6767 W Tropicana, 2 nd Floor
12	Las Vegas, NV 89103
14	Attorney for Charles F. Bowshier
15	CERTIFICATE OF SERVICE
16	I hereby certify that I am an employee of WUV FIRM, LLC and that on the 8 th day of
17	February, 2024, I served the above and foregoing ANSWER on the all parties in compliance
18	with the applicable rules of procedure.
19	Via Hand Delivery to:
20	STATE OF NEVADA DEPARTMENT OF BUSINESS AND INDUSTRY
21	REAL ESTATE DIVISION 3300 WEST SAHARA AVENUE, SUITE 350
22	
	LAS VEGAS, NV 89102
23	Via Us Mail to:
24	Via Us Mail to: OFFICE OF THE ATTORNEY GENERAL Christal P. Keegan, Esq.
	Via Us Mail to: OFFICE OF THE ATTORNEY GENERAL Christal P. Keegan, Esq. 5420 Kietzke Lane #202 Reno, NV 89511
24 25	Via Us Mail to: OFFICE OF THE ATTORNEY GENERAL Christal P. Keegan, Esq. 5420 Kietzke Lane #202
24 25 26	Via Us Mail to: OFFICE OF THE ATTORNEY GENERAL Christal P. Keegan, Esq. 5420 Kietzke Lane #202 Reno, NV 89511
24 25 26 27	Via Us Mail to: OFFICE OF THE ATTORNEY GENERAL Christal P. Keegan, Esq. 5420 Kietzke Lane #202 Reno, NV 89511
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