

1 WESTLEY U. VILLANUEVA, ESQ
2 Nevada Bar No.: 8708
3 WUV FIRM, LLC
4 6767 W. Tropicana Avenue, 2ND Floor
5 Las Vegas, NV 89103
6 725-258-2988
7 wes@wuvfirm.com

FILED

FEB 08 2024

REAL ESTATE COMMISSION

BY *Kelly Valadez*

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Case No.: 2023-463

Petitioner,

11 vs.

12
13 CHARLES F. BOWSHIER,
14 (S.0036055)

Respondent.

ANSWER TO COMPLAINT

17 Now comes Respondent, CHARLES F. BOWSHIER, by and through their attorney
18 WESTLEY U. VILLANUEVA, ESQ. of WUV FIRM, LLC, submits the following Answer to
19 the Complaint filed by the REAL ESTATE DIVISION, DEPARTMENT OF BUSINESS AND
20 INDUSTRY, STATE OF NEVADA.
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FACTUAL ALLEGATIONS

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23 1. Answering Paragraph 1 through 14 of the Complaint, Respondent is without
24 sufficient knowledge or information to form a belief as to the truth of the allegations of this
25 paragraph, and therefore denies the allegations of these Paragraphs.
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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 - Release.
- 2 - Res Judicata.
- 3 - Statute of Frauds.
- 4 - Statute of Limitations.
- 5 - Waiver.

7 **DATED February 8, 2024**

8 Respectfully submitted,

9 **WUV FIRM LLC**


10 
11 Westley U. Villanueva, Esq.
12 NV State Bar No 8708
13 6767 W Tropicana, 2nd Floor
14 Las Vegas, NV 89103
15 Attorney for Charles F. Bowshier

16 **CERTIFICATE OF SERVICE**

17 I hereby certify that I am an employee of WUV FIRM, LLC and that on the 8th day of
18 February, 2024, I served the above and foregoing **ANSWER** on the all parties in compliance
19 with the applicable rules of procedure.

20 Via Hand Delivery to:
21 STATE OF NEVADA
22 DEPARTMENT OF BUSINESS AND INDUSTRY
23 REAL ESTATE DIVISION
24 3300 WEST SAHARA AVENUE, SUITE 350
25 LAS VEGAS, NV 89102

26 Via Us Mail to:
27 OFFICE OF THE ATTORNEY GENERAL
28 Christal P. Keegan, Esq.
5420 Kietzke Lane #202
Reno, NV 89511


/s/ Westley U. Villanueva
Employee of WUV Firm, LLC