



1 KNIGHT & RYAN
 Robert A. Ryan, Esq. #12084
 2 robert@knightryan.com
 Scott A. Knight, Esq. #9083
 3 scott@knightryan.com
 8880 W. Sunset Rd., Ste. 130
 4 Las Vegas, Nevada 89148
 Telephone: (702) 462-6083
 5 Complaintsimile: (702) 462-6084
 Attorneys for Defendant, Paul Randy Guevarra

FILED
 AUG 13 2024
 REAL ESTATE COMMISSION
 BY Kelly Valaden

7 **BEFORE THE REAL ESTATE COMMISSION**

8 **STATE OF NEVADA**

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

Case No.: 2023-994

11 Petitioner,

**RESPONDENT, PAUL RANDY
 GUEVARRA'S ANSWER TO
 COMPLAINT**

12 vs.

13 PAUL RANDY GUEVARRA,

14 Respondent.
 15

16 Respondent, Paul Randy Guevarra ("Mr. Guevarra"), by and through his counsel of record,
 17 Knight & Ryan hereby files his answer to the foregoing Complaint as follows:

18 **JURISDICTION**

19 Answering the Jurisdiction portion of the Complaint, Respondent denies acting as a broker
 20 under NRS 645.030 and/or a salesperson under NRS 645.040 and contests the jurisdiction of the
 21 Real Estate Division of the Department of Business and Industry of the State of Nevada (the
 22 "Division") over Respondent.

23 ...
 24 ...
 25 ...

FACTUAL ALLEGATIONS

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

1. Answering paragraph 1 of the Complaint, Mr. Guevarra admits he was not licensed with the Nevada Real Estate Division.

2. Answering paragraph 2 of the Complaint, Mr. Guevarra is without sufficient knowledge to either admit or deny the allegations contained in this paragraph and on that basis, denies the allegations therein.

3. Answering paragraph 3 of the Complaint, Mr. Guevarra is without sufficient knowledge to either admit or deny the allegations contained in this paragraph and on that basis, denies the allegations therein.

4. Answering paragraph 4 of the Complaint, Mr. Guevarra is without sufficient knowledge to either admit or deny the allegations contained in this paragraph and on that basis, denies the allegations therein.

5. Answering paragraph 5 of the Complaint, Mr. Guevarra is without sufficient knowledge to either admit or deny the allegations contained in this paragraph and on that basis, denies the allegations therein.

6. Answering paragraph 6 of the Complaint, Mr. Guevarra is without sufficient knowledge to either admit or deny the allegations contained in this paragraph and on that basis, denies the allegations therein.

7. Answering paragraph 7 of the Complaint, Mr. Guevarra is without sufficient knowledge to either admit or deny the allegations contained in this paragraph and on that basis, denies the allegations therein.

8. Answering paragraph 8 of the Complaint, Mr. Guevarra admits a Complaint was filed in the Eighth Judicial District Court regarding Ms. Fredericks' prior real property and that said Complaint is ongoing.





1 9. Answering paragraph 9 of the Complaint, Mr. Guevarra is without sufficient
2 knowledge to either admit or deny the allegations contained in this paragraph and on that basis,
3 denies the allegations therein.

4 10. Answering paragraph 10 of the Complaint, Mr. Guevarra admits to receiving an
5 open investigation letter from the Division.

6 11. Answering paragraph 11 of the Complaint, Mr. Guevarra is without sufficient
7 knowledge to either admit or deny the statements made by Mr. Raynoha, but admits to entering
8 into an assignment for the sale of the real property on behalf of RJR Homes, LLC.

9 12. Answering paragraph 12 of the Complaint, Mr. Guevarra is without sufficient
10 knowledge to either admit or deny the authenticity of the documents provided by Mr. Raynoha,
11 but admits entering into a Real Estate Purchase and Sale Agreement on behalf of RJR Homes with
12 Ms. Fredericks.

13 13. Answering paragraph 13 of the Complaint, Mr. Guevarra admits the allegations
14 therein.

15 14. Answering paragraph 14 of the Complaint, Mr. Guevarra denies the allegations
16 therein.

17 15. Answering paragraph 15 of the Complaint, Mr. Guevarra denies the allegations
18 therein.

19 16. Answering paragraph 16 of the Complaint, Mr. Guevarra admits the allegations
20 therein.

21 17. Answering paragraph 17 of the Complaint, Mr. Guevarra admits the allegations
22 therein.

23 18. Answering paragraph 18 of the Complaint, Mr. Guevarra admits the allegations
24 therein.

25



1 19. Answering paragraph 19 of the Complaint, Mr. Guevarra admits the allegations
2 therein.

3 20. Answering paragraph 20 of the Complaint, Mr. Guevarra admits the allegations
4 therein.

5 21. Answering paragraph 21 of the Complaint, Mr. Guevarra admits the allegations
6 therein.

7 22. Answering paragraph 22 of the Complaint, Mr. Guevarra admits assigning the
8 rights of RJR Homes under the Purchase and Sale Agreement with Ms. Fredericks to Alpha
9 Investment Group but denies he did so as a real estate representative, instead, Mr. Guevarra was
10 the owner of RJR Homes.

11 23. Answering paragraph 23 of the Complaint, Mr. Guevarra admits the allegations
12 therein.

13 24. Answering paragraph 24 of the Complaint, Mr. Guevarra admits the allegations
14 therein.

15 25. Answering paragraph 25 of the Complaint, Mr. Guevarra admits the allegations
16 therein.

17 26. Answering paragraph 26 of the Complaint, Mr. Guevarra admits the allegations
18 therein.

19 27. Answering paragraph 27 of the Complaint, Mr. Guevarra admits receiving a letter
20 from the Division in March of 2024.

21 28. Answering paragraph 28 of the Complaint, Mr. Guevarra is without sufficient
22 knowledge to either admit or deny the allegations contained in this paragraph and on that basis,
23 denies the allegations therein.

24 ...

25 ...



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

VIOLATIONS OF LAW

1. Answering paragraph 1 of the Violations of Law, Mr. Guevarra denies acting in the capacity of a real estate broker or salesperson at any time during the above referenced transaction when taking pictures or marketing the property.

2. Answering paragraph 2 of the Violations of Law, Mr. Guevarra denies acting in the capacity of a real estate broker or salesperson at any time during the above referenced transaction or engaging in any representation of Ms. Fredericks by viewing the property with a third party.

3. Answering paragraph 3 of the Violations of Law, Mr. Guevarra denies acting in the capacity of a real estate broker or salesperson at any time during the above referenced transaction by discussing the sale of a real property with third parties.

4. Answering paragraph 4 of the Violations of Law, Mr. Guevarra denies receiving any compensation as a real estate agent or broker.

AFFIRMATIVE DEFENSES

1. The Division lacks jurisdiction under NRS 645 over Mr. Guevarra to impose any penalties.

2. The Division's actions violate Article 1, Section 3 of the Nevada Constitution.

3. The Division's actions are in violation of the scope of NRS 645 and thus violate Article 3, Section 2 of the Nevada Constitution.

...
...
...
...
...
...

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

4. All possible affirmative defenses may not have been alleged herein insofar as sufficient Complaints are not available after reasonable inquiry upon the filing of the Complaint, and therefore, Mr. Mazzini reserves the right to amend this Answer to add additional affirmative defenses as additional Complaints are discovered.

Dated this 9th day of August 2024.

KNIGHT & RYAN

By: 

Robert A. Ryan, Esq. #12084
Scott A. Knight, Esq. #9083
8880 W. Sunset Rd., Ste. 130
Las Vegas, Nevada 89148
Attorneys for Defendant



CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2024, a true and correct copy of the foregoing document **RESPONDENT, PAUL RANDY GUEVARRA'S ANSWER TO COMPLAINT** was served as

follows:

By placing a copy of the original in a sealed envelope, first-class postage fully prepaid thereon, and depositing the envelope in the U.S. Mail at Las Vegas, Nevada, addressed as

follows:

Real Estate Division State of Nevada 3300 W. Sahara Avenue, Suite 350 Las Vegas, Nevada 89102 Attn: Legal Administrative Officer	Phil W. Su Senior Deputy Attorney General 555 E. Washington, Suite 3900 Las Vegas, Nevada 89101
--	--



/s/ [Signature]
An employee of Knight & Ryan

Knight & Ryan
8880 W. Sunset Rd., Ste. 130
Las Vegas, NV 89148

LAS VEGAS NV 890
9 AUG 2024 PM 5 L



Real Estate Division
State of Nevada
3300 W. Sahara Avenue, Suite 350
Las Vegas, Nevada 89102
Attn: Legal Administrative Officer



89102-320375

