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FILED
NOV 25 2024
REAL ESTATE COMMISSION
BY *Kelley Valadez*

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Case Nos.: 2023-959; 2023-960

Petitioner,

vs.

13 ZARBOD ZANGANEH,
14 (B.1000811.LLC- Case No. 2023-959), ALICIA
15 PRESCOTT-LARIVIERE, (S.0172839, Case No.
16 2023-960),

Respondents.

RESPONDENTS' ANSWER TO COMPLAINT

18 Respondents ZARBOD ZANGANEH, (B.1000811.LLC- Case No. 2023-959), and
19 ALICIA PRESCOTT-LARIVIERE, (S.0172839, Case No. 2023-960), (collectively
20 "Respondents") by and through their attorneys of record, the law firm of Marquis Aurbach,
21 hereby answers Petitioner's Complaint as follows:

FACTUAL ALLEGATIONS

23 1. In answering Paragraph 1, Respondents admit the licensed broker allegation and
24 serving as broker for The Agency Las Vegas and are without knowledge or information
25 sufficient to form a belief as to the truth of the remaining allegations and therefore deny the
26 same—the referenced documents speak for themselves.

1 form a belief as to the truth of the allegations contained therein, and therefore, deny the same—
2 the allegations amount to legal conclusions.

3 **GENERAL DENIAL**

4 8. As to any remaining allegations not specifically responded to, Respondents deny
5 the same.

6 **AFFIRMATIVE DEFENSES**

7 1. On information and belief, Respondents pursued an LVR complaint against the
8 other parties/entities involved related to the commission involved and LVR found in favor of
9 Respondents awarding them the related commissions—not in favor of Killackey and the
10 associated individuals and entities.

11 2. Petitioner’s Complaint fails to state a claim upon which relief may be granted or a
12 sanction assessed against the Respondents.

13 3. On information and belief, the offer was non-contingent on pre-approval.

14 4. On information and belief, some of the individuals and/or entities participating in
15 pursuing Respondents in this matter violated ethical considerations, were unsuccessful with LVR
16 complaints/circumstances, and/or were simply pursuing Respondents for personal reasons with
17 the intent to harm Respondents.

18 5. Individuals and parties had an opportunity to conduct due diligence and
19 independently verify information.

20 6. Respondents alleges that the Petitioner’s claims are barred by the equitable
21 doctrines of laches, unclean hands, and failure to do equity.

22 7. Respondents alleges that the Petitioner’s claims were waived and/or it is estopped
23 from asserting the claims the Complaint alleges.

24 8. Respondents alleges that the Petitioner’s Complaint was not filed within a
25 reasonable time, as the events surrounding the allegations occurred in or about 2022.

26 9. Petitioner’s claims are barred in whole or in part due to ratification, acquiescence,
27 and/or consent.

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4. For such other and further relief as the Commission may deem just and proper.
Dated this 25th day of November, 2024.

MARQUIS AURBACH

By /s/ Tye S. Hanseen
Tye S. Hanseen, Esq.
Nevada Bar No. 10365
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Respondent

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of November, 2024, I served a copy of the foregoing
RESPONDENTS' ANSWER TO COMPLAINT upon each of the parties via email to:

Kelly Valadez
Commission Coordinator
Nevada Real Estate Division
3300 W. Sahara Avenue, Suite 350
Las Vegas, Nevada 89102
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/s/ Rosie Wesp
an employee of Marquis Aurbach

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