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9 Attorneys for Respondents

**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 25<sup>th</sup> day of November, 2024.

MARQUIS AURBACH

By /s/ Tye S. Hanseen  
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