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5 Attorneys for Respondent

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

6 **BEFORE THE REAL ESTATE COMMISSION**

7 **STATE OF NEVADA**

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

Case Nos.: 2024-420

11 Petitioner,

12 vs.

13 ZARBOD ZANGANEH,  
(B.1000811.LLC)

14 Respondent.

15  
16 **RESPONDENT'S ANSWER TO COMPLAINT**

17 Respondents ZARBOD ZANGANEH, (B.1000811.LLC- Case No. 2023-959),  
18 ("Respondent") by and through his attorneys of record, the law firm of Marquis Aurbach, hereby  
19 answers Petitioner's Complaint as follows:

20 **FACTUAL ALLEGATIONS**

21 1. In answering Paragraph 1, Respondent admits the licensed broker allegation and  
22 is without knowledge or information sufficient to form a belief as to the truth of the remaining  
23 allegations and therefore denies the same—the referenced documents speak for themselves.

24 2. In answering Paragraph 2, Respondent admits the Division opened up an  
25 investigation and is without knowledge or information sufficient to form a belief as to the truth  
26 of the remaining allegations and therefore denies the same—the referenced documents speak for  
27 themselves.  
28

1 3. In answering Paragraphs 3-10, Respondent is without knowledge or information  
2 sufficient to form a belief as to the truth of the allegations contained therein, and therefore,  
3 denies the same—the referenced documents speak for themselves.

4 **VIOLATIONS OF LAW**

5 4. In answering Paragraphs 1-3 of this section of Petitioner's Complaint, Respondent  
6 is without knowledge or information sufficient to form a belief as to the truth of the allegations  
7 contained therein, and therefore, denies the same—the allegations amount to legal conclusions  
8 applying fact to statutes and sections of administrative code.

9 **DISCIPLINE AUTHORIZED**

10 5. This section of Petitioner's Complaint does not set forth numbered allegations,  
11 but, instead, asserts that discipline against Respondent is authorized and requesting relief.  
12 Considering the circumstances, Respondent is without knowledge or information sufficient to  
13 form a belief as to the truth of the allegations contained therein, and therefore, denies the same—  
14 the allegations amount to legal conclusions.

15 **GENERAL DENIAL**

16 6. As to any remaining allegations not specifically responded to, Respondents denies  
17 the same.

18 **AFFIRMATIVE DEFENSES**

19 1. Petitioner's Complaint fails to state a claim upon which relief may be granted or a  
20 sanction assessed against the Respondent.

21 2. Individuals and parties had an opportunity to conduct due diligence and  
22 independently verify information.

23 3. Respondent alleges that the Petitioner's claims are barred by the equitable  
24 doctrines of laches, unclean hands, and failure to do equity.

25 4. Respondent alleges that the Petitioner's claims were waived and/or it is estopped  
26 from asserting the claims the Complaint alleges.

27 5. Respondent alleges that the Petitioner's Complaint was not filed within a  
28 reasonable time, as the events surrounding the allegations occurred in or about 2020.

1           6.     Petitioner’s claims are barred in whole or in part due to ratification, acquiescence,  
2 and/or consent.

3           7.     If damages were suffered, others’ actions or inactions were the proximate cause of  
4 the damages.

5           8.     Any violations were the result of mistake of fact or law.

6           9.     Respondent did not knowingly or intentionally violate the law or any related  
7 duties.

8           10.    Respondent substantially complied.

9           11.    Respondent hereby incorporates by reference any other affirmative defenses  
10 which may be available under the facts, law, and administrative rules governing these  
11 proceedings as if fully set forth herein. In the event further investigation or discovery reveals the  
12 applicability of any such defenses, Respondent reserves the right to seek leave of the  
13 Commission to amend this Answer to specifically assert any such defense. Such defenses are  
14 herein incorporated by reference for the specific purpose of not waiving any such defense.

**PRAYER FOR RELIEF**

16           WHEREFORE, all material allegations of Petitioner’s Complaint have been denied and  
17 affirmative defenses asserted. Respondent hereby request as follows:

- 18           1.     Respondent prays for a ruling in his favor.  
19           2.     That Petitioner’s take nothing by way of the Complaint and that the Complaint be  
20 dismissed.  
21           3.     That no discipline be taken.

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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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Attorneys for Respondent

**CERTIFICATE OF SERVICE**

I hereby certify that on the 25<sup>th</sup> day of November, 2024, I served a copy of the foregoing  
**RESPONDENT'S ANSWER TO COMPLAINT** upon each of the parties via email to:

Shannon M. Goddard  
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/s/ Rosie Wesp  
an employee of Marquis Aurbach

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