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NEVADA COMMISSION FOR COMMON INTEREST COMMUNITIES AND CONDOMINIUM HOTELS Bret O. Whipple, Esq. 1 Nevada Bar No.: 6168 JUSTICE LAW CENTER 2 1100 S. 10th St. Las Vegas, NV 89104 3 Telephone: (702) 731-0000 4 Facsimile: (702) 974-4008 Email: probate@justice-law-center.com 5 Attorney for Respondent 6 BEFORE THE COMMISSION FOR COMMON-INTEREST COMMUNITIES AND CONDOMINIUM HOTELS 7 8 STATE OF NEVADA 9 SHARATH CHANDRA, Administrator, Case No.: 2024-372 REAL ESTATE DIVISION, 10 DEPARTMENT OF BUSINESS & INDUSTRY, STATE OF NEVADA, ANSWER TO COMPLAINT FOR 11 **DISCIPLINARY ACTION** 12 Petitioner, 13 Vs. 14 TODD JOSLIN, 15 Respondent. 16 COMES NOW Bret O. Whipple, Esq., the attorney for Respondent TODD JOSLIN in this 17 matter, and hereby files this Answer to Complaint for Disciplinary Action on his behalf. This Answer 18 19 is filed in response to the Complaint for Disciplinary Action and Notice of Hearing that was filed 20 against the Defendant on October 31, 2024, in this matter. 21 DATED this 29th day of November, 2024. 22 JUSTICE LAW CENTER 23 /s/ Bret O. Whipple, Esq. Bret O. Whipple, Esq. 24 Nevada Bar No.: 6168 25 1100 S. 10th St. Las Vegas, NV 89104 26 Telephone: (702) 731-0000 Facsimile: (702) 974-4008 27 Email: probate@justice-law-center.com Attorney for Defendants 28 1

FACTUAL ALLEGATIONS

- Answering paragraph 1 of the Factual Allegations section of Plaintiff's Complaint, this
 Answering Defendant does not have sufficient facts to affirm or deny said allegations in this paragraph,
 and therefore, denies this paragraph in its entirety.
- Answering paragraph 2 of the Factual Allegations section of Plaintiff's Complaint, this
 Answering Defendant does not have sufficient facts to affirm or deny said allegations in this paragraph,
 and therefore, denies this paragraph in its entirety.
- 3. Answering paragraph 3 of the Factual Allegations section of Plaintiff's Complaint, this Answering Defendant does not have sufficient facts to affirm or deny said allegations in this paragraph, and therefore, denies this paragraph in its entirety.
- 4. Answering paragraph 4 of the Factual Allegations section of Plaintiff's Complaint, this Answering Defendant does not have sufficient facts to affirm or deny said allegations in this paragraph, and therefore, denies this paragraph in its entirety.
- 5. Answering paragraph 5 of the Factual Allegations section of Plaintiff's Complaint, this Answering Defendant does not have sufficient facts to affirm or deny said allegations in this paragraph, and therefore, denies this paragraph in its entirety.
- Answering paragraph 6 of the Factual Allegations section of Plaintiff's Complaint, this
 Answering Defendant admits each and every allegations therein.
- 7. Answering paragraph 7 of the Factual Allegations section of Plaintiff's Complaint, this Answering Defendant does not have sufficient facts to affirm or deny said allegations in this paragraph, and therefore, denies this paragraph in its entirety.
- 8. Answering paragraph 8 of the Factual Allegations section of Plaintiff's Complaint, this Answering Defendant does not have sufficient facts to affirm or deny said allegations in this paragraph, and therefore, denies this paragraph in its entirety.

VIOLATIONS OF LAW

- 1. Answering paragraph 1 of the Violations of Law section of Plaintiff's Complaint, this Answering Defendant denies each and every allegation in this paragraph in its entirety.
- 1. Answering paragraph 2 of the Violations of Law section of Plaintiff's Complaint, this Answering Defendant denies each and every allegation in this paragraph in its entirety.

DISCIPLINE AUTHORIZED

- 1. Answering paragraph 1 of the Discipline Authorized section of Plaintiff's Complaint, this Answering Defendant does not have sufficient facts to affirm or deny said allegations in this paragraph, and therefore, denies this paragraph in its entirety.
- 2. Answering paragraph 2 of the Discipline Authorized section of Plaintiff's Complaint, this Answering Defendant does not have sufficient facts to affirm or deny said allegations in this paragraph, and therefore, denies this paragraph in its entirety.
- 3. Answering paragraph 3 of the Discipline Authorized section of Plaintiff's Complaint, this Answering Defendant does not have sufficient facts to affirm or deny said allegations in this paragraph, and therefore, denies this paragraph in its entirety.
- 4. Answering paragraph 4 of the Discipline Authorized section of Plaintiff's Complaint, this Answering Defendant does not have sufficient facts to affirm or deny said allegations in this paragraph, and therefore, denies this paragraph in its entirety.

DATED this 29th day of November, 2024.

JUSTICE LAW CENTER

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Attorney for Respondent

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of November, 2024, I submitted the foregoing ANSWER

TO COMPLAINT FOR DISCIPLINARY ACTION to the following parties, as follows:

| Sharath Chandra, Administrator Real Estate Division, Department Of Business and Industry, State of Nevada 3300 W. Sahara Ave. #350 Las Vegas, NV 89102 Ph: (702) 486-4033 | served via email at psu@ag.nv.gov |
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| Aaron D. Ford, Esq., Nevada Attorney General Attn: Phil W. Su, Esq. 555 E. Washington Ave. #3900 Las Vegas, NV 89101 Ph: (702) 486-3420 Attorneys for Real Estate Division | served via email at psu@ag.nv.gov |
| John Leach, Esq. Leach Kern Gruchow Song 2525 Box Canyon Dr. Las Vegas, NV 89128 Ph: (702) 538-9074 | served via email at jleach@lkglawfirm.com |

/s/ Bret O. Whipple, Esq.
An employee of JUSTICE LAW CENTER