

		DEC 0 2 2024	
1	Bret O. Whipple, Esq. Nevada Bar No.: 6168 JUSTICE LAW CENTER	NEVADA COMMISSION FOR COMMON INTEREST COMMUNITIES AND CONDOMINIUM HOTELS MJallo	
3	1100 S. 10 th St. Las Vegas, NV 89104		
4	Telephone: (702) 731-0000 Facsimile: (702) 974-4008		
5	Email: probate@justice-law-center.com Attorney for Respondent		
6	BEFORE THE COMMISSION FOR COMMON-INTEREST		
7	COMMUNITIES AND CONDOMINIUM HOTELS		
8	STATE OF NEVADA		
9	SHARATH CHANDRA, Administrator,)	Case No.: 2024-372	
10	REAL ESTATE DIVISION,) DEPARTMENT OF BUSINESS &)		
11	INDUSTRY, STATE OF NEVADA,	ANSWER TO COMPLAINT FOR DISCIPLINARY ACTION	
12	Petitioner,		
13	Vs.		
14	TODD JOSLIN,		
15 16	Respondent.		
17	COMES NOW Prot O. Whimle For t	he atterney for Respondent TODD JOSI IN in this	
18	COMES NOW Bret O. Whipple, Esq., the attorney for Respondent TODD JOSLIN in this		
19	matter, and hereby files this <u>Answer to Complaint for Disciplinary Action</u> on his behalf. This Answer is filed in response to the Complaint for Disciplinary Action and Notice of Hearing that was filed		
20			
21	DATED this <u>29th</u> day of November	against the Defendant on October 31, 2024, in this matter.	
22			
23		STICE LAW CENTER	
24	Bro	/s/ Bret O. Whipple, Esq. et O. Whipple, Esq.	
25		vada Bar No.: 6168 00 S. 10 th St.	
26		s Vegas, NV 89104 lephone: (702) 731-0000	
27	Fac	csimile: (702) 974-4008 nail: probate@justice-law-center.com	
28		torney for Defendants	
		1	

2. 3. 4. 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. 6. Answering paragraph 6 of the Factual Allegations section of Plaintiff's Complaint, this Answering Defendant admits each and every allegations therein.

Answering paragraph 7 of the Factual Allegations section of Plaintiff's Complaint, this 7. 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.

28

Answering paragraph 1 of the Factual Allegations section of Plaintiff's Complaint, this 1. 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.

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.

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.

	VIOLATIONS OF LAW		
1	VIOLATIONS OF LAW		
2	1. Answering paragraph 1 of the Violations of Law section of Plaintiff's Complaint, this		
3	Answering Defendant denies each and every allegation in this paragraph in its entirety.		
4	1. Answering paragraph 2 of the Violations of Law section of Plaintiff's Complaint, this		
5	Answering Defendant denies each and every allegation in this paragraph in its entirety.		
6	DISCIPLINE AUTHORIZED		
7	1. Answering paragraph 1 of the Discipline Authorized section of Plaintiff's Complaint,		
8	this Answering Defendant does not have sufficient facts to affirm or deny said allegations in this		
9	paragraph, and therefore, denies this paragraph in its entirety.		
10 11			
12	2. Answering paragraph 2 of the Discipline Authorized section of Plaintiff's Complaint,		
13	this Answering Defendant does not have sufficient facts to affirm or deny said allegations in this		
14	paragraph, and therefore, denies this paragraph in its entirety.		
15	3. Answering paragraph 3 of the Discipline Authorized section of Plaintiff's Complaint,		
16	this Answering Defendant does not have sufficient facts to affirm or deny said allegations in this		
17	paragraph, and therefore, denies this paragraph in its entirety.		
18	4. Answering paragraph 4 of the Discipline Authorized section of Plaintiff's Complaint,		
19	this Answering Defendant does not have sufficient facts to affirm or deny said allegations in this		
20	paragraph, and therefore, denies this paragraph in its entirety.		
21	DATED this day of November, 2024.		
22	JUSTICE LAW CENTER		
23	/s/ Bret O. Whipple, Esq.		
24	Bret O. Whipple, Esq.		
25	Nevada Bar No.: 6168 1100 S. 10 th St.		
26	Las Vegas, NV 89104 Telephone: (702) 731-0000		
27	Facsimile: (702) 974-4008 Email: probate@justice-law-center.com		
28	Attorney for Respondent		
	3		

1	CERTIFICATE OF SERVICE		
2	I hereby certify that on the 29 th day of November, 2024, I submitted the foregoing ANSWER		
3	TO COMPLAINT FOR DISCIPLINARY ACTION to the following parties, as follows:		
4	Sharath Chandra, Administrator		
5	Real Estate Division, Department Of Business and Industry,	served via email at psu@ag.nv.gov	
6	State of Nevada 3300 W. Sahara Ave. #350		
7	Las Vegas, NV 89102		
8	Ph: (702) 486-4033		
9	Aaron D. Ford, Esq., Nevada Attorney General	served via email at psu@ag.nv.gov	
10	Attn: Phil W. Su, Esq. 555 E. Washington Ave. #3900		
11	Las Vegas, NV 89101 Ph: (702) 486-3420 Attorneys for Real Estate Division		
12			
13		served via email at	
14	Leach Kern Gruchow Song 2525 Box Canyon Dr.	jleach@lkglawfirm.com	
15	Las Vegas, NV 89128 Ph: (702) 538-9074		
16	Th. (702) 556-5074		
17	/s/ Bret O. Whipple, Esq. An employee of JUSTICE LAW CENTER		
18			
19			
20			
21			
22			
23			
24			
25			
26 27			
27			
20		4	
		*	