

FILED

OCT 31 2022

REAL ESTATE COMMISSION

BY *Kelley Valadez*



1 ANSWER  
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6 Las Vegas, NV 89101  
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9 Attorney for Kenneth Calder

BEFORE THE REAL ESTATE COMMISSION  
STATE OF NEVADA

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

*Petitioner,*

vs.

16 KENNETH CALDER

*Respondent.*

Case No.: 2021-1230

19 **RESPONDENT KENNETH CALDER'S ANSWER TO THE COMPLAINT**

20 Respondent KENNETH CALDER, through my attorney NICHOLAS M.  
21 WOOLDRIDGE of WOOLDRIDGE LAW LTD., answers the Complaint as follows:  
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23 1. Kenneth Calder lacks knowledge or information sufficient to form a belief as to  
24 the truth or falsity of the allegations set forth in paragraphs 32, 34, 36, and denies the  
25 allegations on that basis.  
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2. Kenneth Calder admits the allegations contained in paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 16, 17, 18, 19, 20, 21, 22, 23, 24, 26, 28, 30, 38, 40, 41, 43, 44, 45, and 46.

3. Kenneth Calder denies the allegations contained in paragraphs 14, 25, 27, 29, 31, 33, 35, 37, 39, and 42.

4. As to paragraph 13, from the documents the Division provided, it appears that the Division sent the letter, however, Mr. Calder denies receiving same during that time.

5. As to paragraph 15, Mr. Calder denies that he failed to timely respond as it took time to gather responsive documents.

**AFFIRMATIVE DEFENSES**

1. While Kenneth Calder is a broker for Addicted Realty and one of the principals, he shared different responsibilities with his business partner and other broker, George Anderson. Mr. Anderson was in charge of the finances, banking, and bookkeeping. The Respondent's work at Addicted Realty during the relevant times set forth in the Complaint, did not encompass the company's financials.

2. Kenneth Calder has acted in Good Faith.

3. Wrongful Acts of Others: The wrongful acts alleged by the Division were caused by the wrongful acts of another person, other than the Respondent.

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1 **PRAYERS FOR RELIEF**

2 WHEREFORE, The Respondent prays for relief as follows:

- 3 1. The Division takes nothing by way of the Complaint.  
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5 2. The Division's Complaint be dismissed with prejudice.  
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7 3. For such other and further relief as the Commission deems appropriate and fair.

7 DATED this 25th day of October 2022.

KENNETH CALDER

8 by his attorney,

9  
10 */s/ Nicholas Wooldridge*  
11 Nicholas M. Wooldridge, Esq.  
12 Wooldridge Law Ltd.  
13 400 S. 7th Street Las Vegas, NV 89101  
14 nicholas@wooldridgelawlv.com  
15 (702) 330-4645 Tel.  
16 (702) 359-8494 Fax.

15 **CERTIFICATE OF SERVICE**

16 I confirm that on this 25th day of October, 2022, a copy of the foregoing Answer was  
17 sent electronically to the following addressee as well as sent via first class mail:

18  
19 Real Estate Division  
20 State of Nevada  
21 3300 W. Sahara Ave. Suite 350  
22 Las Vegas, NV 89102  
23 Attn: Commission Coordinator  
24 [sbates@red.nv.gov](mailto:sbates@red.nv.gov)

23 Karissa D. Neff  
24 Senior Deputy Attorney General  
25 555 E. Washington Ave. Ste. 3900  
26 Las Vegas, NV 89101  
27 [kneff@ag.nv.gov](mailto:kneff@ag.nv.gov)

27 */s/ Melody Phommaly*

28 \_\_\_\_\_  
An Employee of Wooldridge Law