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6 *Attorneys for Respondent Steven A. Nicklin*

**FILED**

MAY 09 2025

REAL ESTATE COMMISSION  
BY 

8 **BEFORE THE REAL ESTATE COMMISSION**  
9 **STATE OF NEVADA**

10 SHARATH CHANDRA, Administrator,	) Case No. 2024-474
11 REAL ESTATE DIVISION,	)
12 DEPARTMENT OF BUSINESS &	) <b>RESPONDENT STEVEN A NICKLIN'S</b>
INDUSTRY, STATE OF NEVADA,	) <b>ANSWER TO COMPLAINT</b>
13	)
Petitioner,	)
14	)
vs.	)
15	)
STEVEN A. NICKLIN,	)
16 (B.0012045.CORP; PM.0112045.BKR),	)
17	)
Respondent.	)

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1 concealment of her financial crimes avoided detection from Respondent, his company, the bank,  
2 and law enforcement authorities.

3 9. Respondent denies the allegations set forth in Paragraph 9 of the Complaint  
4 regarding sums Respondent used to fund the trust accounts. On May 24, 2024, Respondent  
5 transferred \$230,000 in personal funds to the trust accounts.

6 10. Respondent admits the allegations set forth in Paragraph 10 of the Complaint.

7 11. Respondent admits the allegations set forth in Paragraph 11 of the Complaint.

8 12. Respondent admits the allegations set forth in Paragraph 12 of the Complaint.

9 13. Respondent admits the allegations set forth in Paragraph 13 of the Complaint.

10 14. Respondent admits the allegations set forth in Paragraph 14 of the Complaint.

11 15. Respondent denies the allegations set forth in Paragraph 15 of the Complaint.  
12 Respondent claimed that Robillard claimed to have been terminated from a prior employer in  
13 December 2023 and had no income from December 2023 until September 27, 2024.

14 16. Respondent admits the allegations set forth in Paragraph 16 of the Complaint.

15 17. Respondent denies the allegations set forth in Paragraph 17 of the Complaint.  
16 Respondent's counsel noted to the Division that Respondent would not be able to provide a  
17 revised reconciliation for 2024 within the due date. Respondent did timely submit a 2024  
18 reconciliation, but Respondent was not aware at the time of submission that the reconciliation  
19 was fraudulent.

20 18. Respondent denies the allegations set forth in Paragraph 18 of the Complaint.  
21 Respondent submitted a revised 2024 General Operating trust account reconciliation report on  
22 December 18, 2024, noting a difference of -\$675,375.22.

23 19. Respondent denies the allegations set forth in Paragraph 19 of the Complaint.  
24 Respondent submitted a revised 2024 Security Deposit trust account reconciliation report on  
25 December 20, 2024, noting a difference of -\$1,595,058.62.

26 20. Respondent admits the allegations set forth in Paragraph 20 of the Complaint.

27 **VIOLATIONS OF LAW**

28 1. Paragraph 1 of the Violations of Law section of the Complaint contains only

1 conclusory allegations and legal conclusions to which no response is required. To the extent a  
2 response is required, Respondent denies the allegations in this Paragraph.

3 2. Paragraph 2 of the Violations of Law section of the Complaint contains only  
4 conclusory allegations and legal conclusions to which no response is required. To the extent a  
5 response is required, Respondent denies the allegations in this Paragraph.

6 3. Paragraph 3 of the Violations of Law section of the Complaint contains only  
7 conclusory allegations and legal conclusions to which no response is required. To the extent a  
8 response is required, Respondent denies the allegations in this Paragraph.

9 4. Paragraph 4 of the Violations of Law section of the Complaint contains only  
10 conclusory allegations and legal conclusions to which no response is required. To the extent a  
11 response is required, Respondent denies the allegations in this Paragraph.

12 5. Paragraph 5 of the Violations of Law section of the Complaint contains only  
13 conclusory allegations and legal conclusions to which no response is required. To the extent a  
14 response is required, Respondent denies the allegations in this Paragraph.

15 6. Paragraph 6 of the Violations of Law section of the Complaint contains only  
16 conclusory allegations and legal conclusions to which no response is required. To the extent a  
17 response is required, Respondent denies the allegations in this Paragraph.

## 18 **AFFIRMATIVE DEFENSES**

### 19 **FIRST AFFIRMATIVE DEFENSE**

#### 20 **(Reservation of Affirmative Defenses)**

21 1. All possible affirmative defenses may not have been alleged herein insofar as  
22 sufficient facts were not available after reasonable inquiry upon filing of this Answer to the  
23 Complaint, and therefore answering Respondent reserves its right to amend his Answer to the  
24 Complaint as additional information becomes available.

## 25 **PRAYER FOR RELIEF**

26 WHEREFORE, Mr. Nicklin prays for relief against Petitioners as follows:

27 1. That Petitioners take nothing by reason of their Complaint in this action.

28 2. For such other and further relief as the Court may deem just and proper under these

1 circumstances.

2  
3 Dated: May 8, 2025

**ENENSTEIN PHAM GLASS & RABBAT LLP**

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6 Robert A. Rabbat

*Attorneys for Respondent Steven A. Nicklin*

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REAL ESTATE DIVISION  
STATE OF NEVADA  
3300 W. Sahara Avenue, Suite 350  
Las Vegas, NV 89102  
Attn: Legal Administrative Officer

/s/Lauren A. Verbanik  
Lauren Verbanik, *Paralegal*

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# USPS CERTIFIED MAIL™

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Robert A. Rabbat  
11920 SOUTHERN HIGHLANDS PKWY STE 1  
LAS VEGAS NV 89141-3273

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