

**BEFORE THE HEARING BOARD OF THE  
ILLINOIS ATTORNEY REGISTRATION  
AND  
DISCIPLINARY COMMISSION**

FILED  
2/15/2022 11:57 PM  
ARDC Clerk

**IN THE MATTER OF:** )  
 )  
**NICOLE LYNN BERAN,** )  
 )  
**Attorney-Respondent,** ) **Commission No. 2021PR00076**  
 )  
**No. 6271587.** )

**ANSWER TO COMPLAINT**

**NOW COMES** the Attorney-Respondent, NICOLE LYNN BERAN, and responds to the Complaint as follows:

1. The Attorney-Respondent admits the allegations in paragraph one.
2. The Attorney-Respondent admits the allegations in paragraph two.

COUNT I

3. The Attorney-Respondent admits the allegations in paragraph three.
4. The Attorney-Respondent admits the allegations in paragraph four.
5. The Attorney-Respondent admits the allegations in paragraph five.
6. The Attorney-Respondent admits the allegations in paragraph six except for the allegations that Attorney-Respondent sent the draft petition to Ms. Mathey for Ms. Mathey’s review and signature and that Ms. Mathey returned the petition to Attorney-Respondent via email, which allegations are denied.
7. The Attorney-Respondent admits the allegations in paragraph seven.
8. The Attorney-Respondent admits the allegations in paragraph eight.
9. The Attorney-Respondent denies the allegation that she never responded to Ms. Mathey’s email or letter and admits the remaining allegations in paragraph nine.

10. The Attorney-Respondent admits the allegations in paragraph ten.
11. The Attorney-Respondent denies the allegations in paragraph eleven.

COUNT II

12. The Attorney-Respondent admits the allegations in paragraph twelve except that Ms. Gustafson was known as Ms. Bryant on July 29, 2016 and up until the entry of the Judgment for Dissolution of Marriage.
13. The Attorney-Respondent denies the allegations in paragraph thirteen.
14. The Attorney-Respondent admits the allegations in paragraph fourteen.
15. The Attorney-Respondent admits the allegations in paragraph fifteen.
16. The Attorney-Respondent admits the allegations in paragraph sixteen.
17. The Attorney-Respondent admits the allegations in paragraph seventeen.
18. The Attorney-Respondent admits the allegations in paragraph eighteen.
19. The Attorney-Respondent admits the allegations in paragraph nineteen.
20. The Attorney-Respondent admits the allegations in paragraph twenty.
21. The Attorney-Respondent admits the allegations in paragraph twenty-one.
22. The Attorney-Respondent admits the allegations in paragraph twenty-two.
23. The Attorney-Respondent admits the allegations in paragraph twenty-three.

24. The Attorney-Respondent admits the allegations in paragraph twenty-four.
25. The Attorney-Respondent admits the allegations in paragraph twenty-five.
26. The Attorney-Respondent admits the allegations in paragraph twenty-six.
27. The Attorney-Respondent admits the allegations in paragraph twenty-seven.
28. The Attorney-Respondent admits the allegations in paragraph twenty-eight with the exception of the allegation that Ms. Gustafson called and left messages three to five times every week, which she denies.
29. The Attorney-Respondent does not have sufficient knowledge or information to form a belief as to the allegations in paragraph 29 and therefore denies the same.
30. The Attorney-Respondent denies the allegations in paragraph thirty.

### COUNT III

31. The Attorney-Respondent admits the allegations in paragraph thirty-one.
32. The Attorney-Respondent admits the allegations in paragraph thirty-two.
33. The Attorney-Respondent admits the allegations in paragraph thirty-three.
34. The Attorney-Respondent denies the allegations in paragraph 34.
35. The Attorney-Respondent admits the allegations in paragraph thirty-five.
36. The Attorney-Respondent denies the allegations in paragraph thirty-six.
37. The Attorney-Respondent admits the allegations in paragraph

thirty-seven except for the allegation that Mr. Issom completed and sent to Respondent the affidavit and requested documents within two weeks of receiving Respondent's email, which she denies.

38. The Attorney-Respondent denies the allegations in paragraph thirty-eight.
39. The Attorney-Respondent admits the allegations in paragraph thirty-nine.
40. The Attorney-Respondent admits the allegation that on January 22, 2021, Mr. Issom emailed Respondent and discharged Respondent and asked that his unused advanced fee payment be refunded. The Attorney-Respondent denies the remaining allegations in paragraph forty.
41. The Attorney-Respondent denies the allegations in paragraph forty-one.

#### COUNTY IV

42. The Attorney-Respondent admits the allegations in paragraph forty-two.
43. The Attorney-Respondent admits the allegations in paragraph forty-three.
44. The Attorney-Respondent admits the allegations in paragraph forty-four.
45. The Attorney-Respondent admits the allegations in paragraph forty-five.
46. The Attorney-Respondent admits the allegations in paragraph forty-six.
47. The Attorney-Respondent admits the allegations in paragraph forty-seven.
48. The Attorney-Respondent admits the allegations in paragraph forty-eight.
49. The Attorney-Respondent admits the allegations in paragraph

forty-nine.


50. The Attorney-Respondent admits the allegations in paragraph fifty.

51. The Attorney-Respondent admits the allegations in paragraph fifty-one.

52. The Attorney-Respondent admits the allegations in paragraph fifty-two.

**WHEREFORE**, the Attorney-Respondent, NICOLE L. BERAN, respectfully requests that the relief requested in the Complaint be denied.

Respectfully submitted,

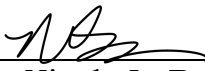
By:   
\_\_\_\_\_  
Nicole L. Beran

Prepared by:  
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Rule 231 Information

1. Respondent is admitted to practice law in the State of Wisconsin in 1999, U.S. District Court for the Northern District of Illinois, U.S. District Court for the Eastern District of Wisconsin in 1999 and the U.S. District Court for the Western District of Wisconsin in 1999.
2. Respondent has only even been known as Nicole Lynn Beran.
3. Respondent has a Wisconsin State Bar No. of 1034715.
4. Respondent does not have any other professional license or certificate.

Respectfully submitted,

By:   
\_\_\_\_\_  
Nicole L. Beran

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