

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**BEFORE THE COMMISSION FOR COMMON-INTEREST  
COMMUNITIES AND CONDOMINIUM HOTELS  
STATE OF NEVADA**

GAIL J. ANDERSON, Administrator, REAL  
ESTATE DIVISION, DEPARTMENT OF  
BUSINESS & INDUSTRY, STATE OF  
NEVADA,

Petitioner,

vs.

SIERRA GARDENS HOME OWNERS  
ASSOCIATION, DAVID HOUGE, ROY  
ROUNDY, STEPHEN WILLNER, BRENDA  
HELLER, ARDELLA BRAUTIGAM, and  
RONALD DECK,

Respondents.

Case No. IN-12-1580/CIN 12-05-29-216

**FILED**

SEP 06 2013

NEVADA COMMISSION OF  
COMMON INTEREST COMMUNITIES  
AND CONDOMINIUM HOTELS

**STIPULATION AND ORDER FOR SETTLEMENT OF DISCIPLINARY ACTION**

Petitioner, Real Estate Division of the Department of Business and Industry, State of Nevada (the "Division"), through its Administrator, Gail J. Anderson, and Respondents, SIERRA GARDENS HOME OWNERS ASSOCIATION, DAVID HOUGE, ROY ROUNDY, STEVE WILLNER, BRENDA HELLER, ARDELLA BRAUTIGAM, and RONALD DECK by and through their undersigned counsel, stipulate and agree as follows.

**JURISDICTION AND NOTICE ALLEGED IN THE COMPLAINT**

1. RESPONDENT SIERRA GARDENS HOME OWNERS ASSOCIATION (the "ASSOCIATION") is a common interest community – defined by NRS 116.021 – located in Reno, Nevada.

2. RESPONDENTS DAVID HOUGE, ROY ROUNDY, STEVE WILLNER, BRENDA HELLER, ARDELLA BRAUTIGAM, and RONALD DECK were, at relevant times, members of the board of directors for the ASSOCIATION.

3. The Board of Directors and the ASSOCIATION were at all relevant times subject to the provisions of Chapter 116 of each the Nevada Revised Statutes ("NRS") and the Nevada Administrative Code ("NAC") (collectively referred to as "NRS 116") and are subject to

1 the jurisdiction of the Division, and the Commission for Common Interest Communities  
2 pursuant to the provisions of NRS 116.750.

3 4. An Intervention Affidavit was filed on or about March 16, 2012 alleging that the  
4 RESPONDENTS violated provisions of NRS 116.

5 **SUMMARY OF FACTUAL ALLEGATIONS ALLEGED IN THE COMPLAINT**

6 5. The ASSOCIATION is currently self-managed and has never been  
7 professionally managed.

8 6. The ASSOCIATION consists of 209 units and has an annual budget of  
9 approximately \$125,000.

10 7. The ASSOCIATION, through its board of directors, authorized payments to its  
11 officers and directors for many years.

12 8. The ASSOCIATION'S governing documents from 1983 allow for fixed sums and  
13 expenses to be paid to board members and for salaries to be paid to the officers.

14 9. RESPONDENTS DAVID HOUGE, ROY ROUNDY, STEVE WILLNER, BRENDA  
15 HELLER, ARDELLA BRAUTIGAM, and RONALD DECK received payments from  
16 ASSOCIATION for serving on the ASSOCIATION'S board of directors in the amount of  
17 approximately \$50 per meeting, plus occasional bonuses.

18 10. The ASSOCIATION'S board of directors met on a monthly basis. The payments  
19 to the board members were generally equal to the amount of the assessments due to the  
20 ASSOCIATION.

21 11. From January 2005 through January 2012, RESPONDENT ROY ROUNDY  
22 received payment in the amount of \$4,245.00 from the ASSOCIATION for serving on the  
23 board of directors.

24 12. From January 2005 through June 2012, RESPONDENT DAVID HOUGE  
25 received payment in the amount of \$4,640.00 from the ASSOCIATION for being on the board  
26 of directors, including a \$200 bonus in October of 2011.

27 13. From January 2009 through June 2012, RESPONDENT ARDELLA  
28 BRAUTIGAM received payment in the amount of \$2,250.00 from the ASSOCIATION for being  
on the board of directors, including a \$200 bonus in October of 2011.

1           14. From July 2009 through June 2011, RESPONDENT RONALD DECK receive  
2 payment in the amount of \$1,200.00 from the ASSOCIATION for being on the board c  
3 directors.

4           15. From July 2011 through March 2012, RESPONDENT BRENDA HELLEF  
5 received payment in the amount of \$700.00 from the ASSOCIATION for being on the board o  
6 directors, including a \$200 bonus in October of 2011.

7           16. From February 2012 through June 2012, RESPONDENT STEPHEN WILLNER  
8 received payment in the amount of \$250.00 from the ASSOCIATION for being on the board of  
9 directors.

10           17. RESPONDENT ROY ROUNDY served as the secretary and treasurer of the  
11 ASSOCIATION from 2005 through January 2012.

12           18. From July 2005 through March 2012, RESPONDENT ROY ROUNDY received  
13 payment in the amount of \$46,647.50 from the ASSOCIATION as a salary for acting as the  
14 secretary and treasurer of the ASSOCIATION, including a \$777.50 bonus in October of 2011.

15           19. The ASSOCIATION employs Connie Buus, a unit owner, to perform certain  
16 bookkeeping duties for the ASSOCIATION. She is not a licensed community manager. She  
17 was paid as much as \$3,200 per month in exchange for her services, but since May of 2012  
18 she is paid \$1,200 per month.

19           20. RESPONDENTS DAVID HOUGE, ROY ROUNDY, ARDELLA BRAUTIGAM,  
20 and RONALD DECK took action at the ASSOCIATION'S March 31, 2010 meeting to make  
21 Connie Buus an officer of the ASSOCIATION, so she could sign checks.

22           21. RESPONDENT ROY ROUNDY, while acting as secretary and treasurer, and  
23 while serving on the board of directors, authorized a payment advance to Bookkeeper Connie  
24 Buus in the amount of \$1,365.00.

25           22. RESPONDENT ROY ROUNDY prepared the profit and loss statement reflecting  
26 the advance to Connie Buus as "Legal Fees."

27           23. Connie Buus, while employed as the ASSOCIATION'S bookkeeper, signed  
28 (along with RESPONDENT ROY ROUNDY) ASSOCIATION check number 8884, dated  
September 15, 2011, payable to herself, in the amount of \$2,050.00.

1 24. The ASSOCIATION reports to the Division that it no longer allows the  
2 bookkeeper to sign checks.

3 25. The ASSOCIATION hired RESPONDENT BRENDA HELLER, a unit owner, to  
4 be the Inspector of the Architectural Committee.

5 26. RESPONDENT BRENDA HELLER was paid \$2,400 as an employee of the  
6 ASSOCIATION while she also served on the board of directors from July 2011 through March  
7 2012.

8 27. In July 2011, RESPONDENT BRENDA HELLER was appointed to the board of  
9 directors without any documented action by the ASSOCIATION'S board to fill the vacancy left  
10 by another board member.

11 28. The ASSOCIATION did not have a professional reserve study until April of 2013.

12 29. As a result of the Division's investigation, the ASSOCIATION procured a  
13 professional reserve study dated April 23, 2013.

14 30. The current reserve study reflects that the ASSOCIATION is underfunded in the  
15 amount of \$306,361.02.

16 31. The ASSOCIATION never had an independent certified public accountant  
17 review the financials of the ASSOCIATION until 2013.

18 32. As a result of the Division's investigation, the ASSOCIATION procured an  
19 accountant's review of the financial statements of the ASSOCIATION for the year ending  
20 2012.

21 33. RESPONDENTS DAVID HOUGE, ROY ROUNDY, STEVE WILLNER, BRENDA  
22 HELLER, ARDELLA BRAUTIGAM, and RONALD DECK acted knowingly and willfully in their  
23 actions to authorize and accept payments from the ASSOCIATION.

24 **SUMMARY OF VIOLATIONS OF LAW ALLEGED IN THE COMPLAINT**

25 34. RESPONDENTS DAVID HOUGE, ROY ROUNDY, STEVE WILLNER, BRENDA  
26 HELLER, ARDELLA BRAUTIGAM, and RONALD DECK violated NRS 116.31187 by  
27 accepting compensation from the ASSOCIATION while serving on the board of directors.  
28

1           35.   RESPONDENT ROY ROUNDY violated NRS 116.31187 by accepting  
2 compensation for services provided by him in his capacity as the ASSOCIATION'S secretary  
3 and treasurer.

4           36.   RESPONDENTS DAVID HOUGE, ROY ROUNDY, STEVE WILLNER, BRENDA  
5 HELLER, ARDELLA BRAUTIGAM, and RONALD DECK violated NRS 116.3103 by failing to  
6 act in the best interests of the ASSOCIATION when they accepted compensation from the  
7 ASSOCIATION while they were on the board of directors and/or officers of the  
8 ASSOCIATION.

9           37.   RESPONDENTS DAVID HOUGE, ROY ROUNDY, STEVE WILLNER, BRENDA  
10 HELLER, ARDELLA BRAUTIGAM, and RONALD DECK violated NRS 116.3103 (through  
11 NAC 116.405(6)) by failing to keep informed of laws, regulations and developments relating to  
12 the business of the ASSOCIATION.

13           38.   RESPONDENTS DAVID HOUGE, ROY ROUNDY, STEVE WILLNER, BRENDA  
14 HELLER, ARDELLA BRAUTIGAM, and RONALD DECK violated NRS 116.3103 (through  
15 NAC 116.405(3)) for committing acts or omissions which amount to incompetence, negligence  
16 or gross negligence by failing to have a professional reserve study performed and by failing to  
17 properly fund the ASSOCIATION'S reserve account.

18           39.   RESPONDENTS DAVID HOUGE, ROY ROUNDY, STEVE WILLNER, BRENDA  
19 HELLER, ARDELLA BRAUTIGAM, and RONALD DECK violated NRS 116.3103 (through  
20 NAC 116.405(3)) for committing acts or omissions which amount to incompetence, negligence  
21 or gross negligence when they failed to cause the ASSOCIATION to have financial  
22 statements reviewed by an independent certified public accountant for each year they served  
23 on the board of directors prior to 2013.

24           40.   RESPONDENTS DAVID HOUGE, ROY ROUNDY, STEVE WILLNER, BRENDA  
25 HELLER, ARDELLA BRAUTIGAM, and RONALD DECK violated NRS 116.3103 (through  
26 NAC 116.405(8)(e)) by failing to cause the ASSOCIATION to consult with appropriate  
27 professionals as necessary before making major decisions affecting the ASSOCIATION.

28           41.   RESPONDENTS DAVID HOUGE, ROY ROUNDY, and ARDELLA BRAUTIGAM  
violated NRS 116.3103 (through NAC 116.405(3)) by committing acts or omissions which

1 amount to incompetence, negligence or gross negligence when they filled a vacancy on the  
2 board of directors by appointing RESPONDENT BRENDA HELLER without a meeting or any  
3 formal action of the ASSOCIATION and while she was an employee of the ASSOCIATION.

4 42. RESPONDENTS DAVID HOUGE, ROY ROUNDY, ARDELLA BRAUTIGAM,  
5 and RONALD DECK violated NRS 116.3103 (through NAC 116.405(3)) by committing acts or  
6 omissions which amount to incompetence, negligence or gross negligence when they took  
7 action to make their employed bookkeeper an officer of the ASSOCIATION with specific  
8 authority to sign checks on behalf of the ASSOCIATION.

9 43. RESPONDENTS DAVID HOUGE, ROY ROUNDY, STEVE WILLNER, BRENDA  
10 HELLER, ARDELLA BRAUTIGAM, and RONALD DECK violated NRS 116.3103 (through  
11 NAC 116.405(3)) by committing acts or omissions which amount to incompetence, negligence  
12 or gross negligence when they allowed their employed bookkeeper/officer to sign  
13 ASSOCIATION checks in violation of NRS 116.31187.

14 44. RESPONDENTS DAVID HOUGE, ROY ROUNDY, ARDELLA BRAUTIGAM,  
15 and RONALD DECK violated NRS 116.3103 (through NAC 116.405(8)(g)) by failing to call  
16 the ASSOCIATION to maintain current, accurate, and properly documented financial records  
17 when the June 2011 financial statement reflected legal fees that actually represented an  
18 advance payment to an employee of the ASSOCIATION.

19 45. RESPONDENTS DAVID HOUGE, ROY ROUNDY, ARDELLA BRAUTIGAM,  
20 and RONALD DECK violated NRS 116.3103 (through NAC 116.405(8)(i)) by failing to  
21 establish policies and procedures that are designed to provide reasonable assurances in the  
22 reliability of financial reporting which resulted in inaccurate financial records and an advance  
23 payment to an employee.

#### 24 DISCIPLINE AUTHORIZED

25 Pursuant to the provisions of NRS 116.615; NRS 116.755; NRS 116.785; and NRS  
26 116.790 the Commission has discretion to take any or all of the following actions:

- 27 1. Issue an order directing RESPONDENTS to cease and desist from continuing to  
28 engage in the unlawful conduct that resulted in the violation.

- 1 2. Issue an order directing RESPONDENTS to take affirmative action to correct any
- 2 conditions resulting from the violation.
- 3 3. Impose an administrative fine of up to \$1,000 for each violation by RESPONDENTS.
- 4 4. Order an audit of the ASSOCIATION, at the expense of the ASSOCIATION.
- 5 5. Require the executive board to hire a community manager who holds a certificate.
- 6 6. If RESPONDENTS are found to have knowingly and willfully committed a violation of
- 7 Chapter 116 and it is in the best interest of the ASSOCIATION, RESPONDENTS may
- 8 be removed from their positions as director and/or officer.
- 9 7. Require RESPONDENTS to pay the costs of the proceedings incurred by the Division,
- 10 including, without limitation, the cost of the investigation and reasonable attorney's
- 11 fees.
- 12 8. If the Commission finds that the RESPONDENTS knowingly and willfully violated the
- 13 provisions of Chapter 116, the Commission may order that such RESPONDENTS be
- 14 personally liable for all fines and costs imposed.
- 15 9. Take whatever further disciplinary action as the Commission deems appropriate.
- 16 The Commission may order one or any combination of the discipline described above.

17 **SETTLEMENT**

- 18 1. The Parties desire to compromise and settle the instant controversy pursuant to
- 19 the following terms and conditions.
- 20 2. The ASSOCIATION agrees not to authorize any payment to its board of
- 21 directors or officers as compensation for services.
- 22 3. Beginning within 10 days from the date this Stipulation and Order is signed by
- 23 the Commission:
  - 24 a. RESPONDENT ROY ROUNDY agrees to pay no less than \$50.00 each month
  - 25 to the ASSOCIATION up to the amount of \$4,245.00 – representing the amount of unpaid
  - 26 assessments due.
- 27
- 28

1           b. RESPONDENT DAVID HOUGE agrees to pay no less than \$50.00 each month  
2 to the ASSOCIATION up to the amount of \$4,640.00 – representing the amount of unpaid  
3 assessments due.

4           c. RESPONDENT ARDELLA BRAUTIGAM agrees to pay no less than \$50.00  
5 each month to the ASSOCIATION up to the amount of \$2,250.00 – representing the amount  
6 of unpaid assessments due.

7           d. RESPONDENT RONALD DECK agrees to pay no less than \$300.00 each  
8 month to the ASSOCIATION up to the amount of \$1,200.00 – representing the amount of  
9 unpaid assessments due.

10          4.       RESPONDENT BRENDA HELLER agrees to pay \$700.00 to the ASSOCIATION  
11 – representing the amount of unpaid assessments due – within 60 days from the date this  
12 Stipulation and Order is signed by the Commission.

13          5.       RESPONDENT STEPHEN WILLNER agrees to pay \$250.00 to the  
14 ASSOCIATION – representing the amount of unpaid assessments due – within 60 days from  
15 the date this Stipulation and Order is signed by the Commission.

16          6.       RESPONDENTS DAVID HOUGE, ROY ROUNDY, STEVE WILLNER, BRENDA  
17 HELLER, ARDELLA BRAUTIGAM, and RONALD DECK agree not to run as a candidate for  
18 the ASSOCIATION'S board of directors without disclosing to the owners that they are not in  
19 good standing until all amounts due under this Stipulation and Order are paid to the  
20 ASSOCIATION.

21          7.       If RESPONDENTS DAVID HOUGE, STEVE WILLNER, BRENDA HELLER,  
22 ARDELLA BRAUTIGAM, and RONALD DECK serve on the board of directors for any  
23 common-interest community in the State of Nevada, they agree to take no less than 6 hours of  
24 classes offered by the Division (provided they are offered in the Reno, Nevada area) for each  
25 year they serve on such board until the date that is 3 years from the date this Stipulation and  
26 Order is signed by the Commission.

27          8.       The ASSOCIATION agrees that all current members (and any member added  
28 within the next 6 months) of its board of directors shall take no less than 6 hours of class

1 offered by the Division (provided they are offered in the Reno, Nevada area) within 1 year  
2 from the date this Stipulation and Order is signed by the Commission.

3 9. The ASSOCIATION agrees to hire a community manager to manage the affairs  
4 of the ASSOCIATION and to maintain professional management for no less than 10 years  
5 from the date this Stipulation and Order is signed by the Commission.

6 10. The ASSOCIATION acknowledges that its reserve account is severely deficient.

7 11. The ASSOCIATION agrees to take all reasonable efforts necessary to properly  
8 fund its reserve account based on its 2013 reserve study.

9 12. The ASSOCIATION shall place all funds received as a result of this Stipulation  
10 and Order in the ASSOCIATION'S reserve account.

11 13. The Division agrees not to pursue any other or greater remedies or fines in  
12 connection with RESPONDENTS' alleged conduct referenced herein.

13 14. RESPONDENTS and the Division agree that by entering into this Stipulation and  
14 Order, the Division does not concede any defense or mitigation RESPONDENTS may assert  
15 and that once this Stipulation and Order is approved and fully performed, the Division will  
16 close its file in this matter.

17 15. This Stipulation and Order includes any claims that could have been included in  
18 a supplemental or amended complaint arising from the same operative facts, transactions and  
19 occurrences in existence as of the effective date of this Agreement. However, this Settlement  
20 does not include claims arising from facts or circumstances which have been concealed by  
21 RESPONDENTS.

22 16. RESPONDENTS agree that if the terms and conditions of this Stipulation and  
23 Order are not met, the Division may, at its option, rescind this Stipulation and Order and  
24 proceed with prosecuting the Complaint before the Commission.

25 17. RESPONDENTS agree and understand that by entering into this Stipulation and  
26 Order, RESPONDENTS are waiving their right to a hearing at which RESPONDENTS may  
27 present evidence in their defense, their right to a written decision on the merits of the  
28 Complaint, their rights to reconsideration and/or rehearing, appeal and/or judicial review, and  
all other rights which may be accorded by the Nevada Administrative Procedure Act, the

1 Nevada Common Interest Ownership statutes and accompanying regulations, and the federal  
2 and state constitutions. RESPONDENTS understand that this Stipulation and Order and other  
3 documentation may be subject to public records laws. The Commission members who review  
4 this matter for approval of this Stipulation and Order may be the same members who  
5 ultimately hear, consider and decide the Complaint if this Stipulation and Order is either not  
6 approved by the Commission or is not timely performed by RESPONDENTS.  
7 RESPONDENTS fully understand that they have the right to be represented by legal counsel  
8 in this matter at their own expense.

9 18. Each party shall bear its own attorney's fees and costs.

10 19. Stipulation and Order is Not Evidence. Neither this Stipulation and Order nor  
11 any statements made concerning this Stipulation and Order may be discussed or introduced  
12 into evidence at any hearing on the Complaint, if the Division must ultimately present its case  
13 based on the Complaint filed in this matter.

14 20. Approval of Stipulation and Order. Once executed, this Stipulation and Order  
15 will be filed with the Commission and will be placed on the agenda for approval at its August  
16 2013 public meeting. The Division will recommend to the Commission approval of the  
17 Stipulation and Order. RESPONDENTS agree that the Commission may approve, reject, or  
18 suggest amendments to this Stipulation and Order and that it must be accepted or rejected by  
19 RESPONDENTS before any amendment is effective.

20 21. Withdrawal of Stipulation and Order. If the Commission rejects this Stipulation  
21 and Order or suggests amendments unacceptable to RESPONDENTS, RESPONDENTS may  
22 withdraw from this Stipulation and Order and the Division may pursue its Complaint before the  
23 Commission at the Commission's next regular public meeting.

24 22. Release. In consideration of execution of this Stipulation and Order, the  
25 RESPONDENTS for themselves, their heirs, executors, administrators, successors, and  
26 assigns, hereby releases, remises, and forever discharges the State of Nevada, the  
27 Department of Business and Industry and the Division, and each of their respective members,  
28 agents, employees and counsel in their individual and representative capacities, from any and  
all manner of actions, causes of action, suits, debts, judgments, executions, claims, and

1 demands whatsoever, known and unknown, in law or equity, that the RESPONDENTS ever  
2 had, now has, may have, or claim to have, against any or all of the persons or entities named  
3 in this section, arising out of or by reason of the Division's investigation, this disciplinary  
4 action, and all other matters relating thereto.

5       23. Indemnification. RESPONDENTS hereby indemnify and hold harmless the  
6 State of Nevada, the Department of Business and Industry, the Division, and each of their  
7 respective members, agents, employees and counsel in their individual and representative  
8 capacities against any and all claims, suits, and actions brought against said persons and/or  
9 entities by reason of the Division's investigation, this disciplinary action and all other matters  
10 relating thereto, and against any and all expenses, damages, and costs, including court costs  
11 and attorney fees, which may be sustained by the persons and/or entities named in this  
12 section as a result of said claims, suits, and actions.

13       24. RESPONDENTS have signed and dated this Stipulation and Order only after  
14 reading and understanding all terms herein.

15  
16 Dated: 8-27-13

REAL ESTATE DIVISION  
DEPARTMENT OF BUSINESS & INDUSTRY  
STATE OF NEVADA

17  
18  
19 By:   
GAIL J. ANDERSON, Administrator

20  
21 ///  
22 ///  
23 ///

24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: 8/26/13 SIERRA GARDENS HOME OWNER  
ASSOCIATION, RESPONDENT

By: David Houge

Name: DAVID HOUGE

Title: HOA PRESIDENT

Dated: 8/24/13 By: David Houge  
DAVID HOUGE, RESPONDENT

Dated: \_\_\_\_\_ By: \_\_\_\_\_  
ROY ROUNDY, RESPONDENT

Dated: 8/24/13 By: Stephen Willner  
STEPHEN WILLNER, RESPONDENT

Dated: 8/25/13 By: Brenda Heller  
BRENDA HELLER, RESPONDENT

Dated: 8/26/13 By: Ardeella Brautigam  
ARDELLA BRAUTIGAM, RESPONDENT

Dated: 8-24-13 By: Ronald Deck  
RONALD DECK, RESPONDENT

///  
///  
///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: \_\_\_\_\_ SIERRA GARDENS HOME OWNERS  
ASSOCIATION, RESPONDENT

By: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Dated: \_\_\_\_\_ By: \_\_\_\_\_  
DAVID HOUGE, RESPONDENT

Dated: 8/30/13 By: Roy Roundy  
ROY ROUNDY, RESPONDENT

Dated: \_\_\_\_\_ By: \_\_\_\_\_  
STEPHEN WILLNER, RESPONDENT

Dated: \_\_\_\_\_ By: \_\_\_\_\_  
BRENDA HELLER, RESPONDENT

Dated: \_\_\_\_\_ By: \_\_\_\_\_  
ARDELLA BRAUTIGAM, RESPONDENT

Dated: \_\_\_\_\_ By: \_\_\_\_\_  
RONALD DECK, RESPONDENT

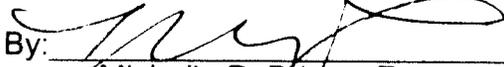
///  
///  
///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Approved as to form:

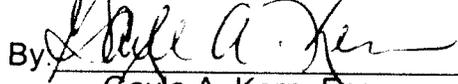
CATHERINE CORTEZ MASTO  
Attorney General

Dated: Aug 27, 2013

By:   
Michelle D. Briggs, Esq,  
Senior Deputy Attorney General  
Attorney for the Division

KERN & ASSOCIATES, LTD.

Dated: August 27, 2013

By:   
Gayle A. Kern, Esq.  
Attorneys for Respondents

**IT IS ORDERED** that the foregoing Stipulation and Order is approved in full.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2013.

COMMISSION FOR COMMON-INTEREST  
COMMUNITIES AND CONDOMINIUM HOTELS  
DEPARTMENT OF BUSINESS & INDUSTRY  
STATE OF NEVADA

By: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

1 Approved as to form:

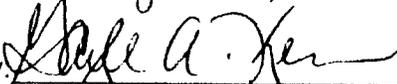
2 CATHERINE CORTEZ MASTO  
3 Attorney General

KERN & ASSOCIATES, LTD.

Dated: August 27, 2013

4 Dated: Aug 27, 2013

5 By:   
6 Michelle D. Briggs, Esq,  
7 Senior Deputy Attorney General  
8 Attorney for the Division

By:   
9 Gayle A. Kern, Esq.  
10 Attorneys for Respondents

11 **IT IS ORDERED** that the foregoing Stipulation and Order is approved in full.

12 Dated this 4<sup>TH</sup> day of SEPTEMBER, 2013.

13 COMMISSION FOR COMMON-INTEREST  
14 COMMUNITIES AND CONDOMINIUM HOTELS  
15 DEPARTMENT OF BUSINESS & INDUSTRY  
16 STATE OF NEVADA

17 By: 

18 Name: RANDOLPH WATKINS

19 Title: CHAIRMAN

