

SEP 09 2022

NEVADA COMMISSION FOR
COMMON INTEREST COMMUNITIES
AND CONDOMINIUM HOTELS

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

Kelly Valadez

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Sharath Chandra, Administrator, Real Estate
Division, Department of Business & Industry, State
of Nevada,

Petitioner,

vs.

Monterey Grand Manor Owners Association, Dale
Milligan, Susan Moore, Richard Jagodzinski, Saturday
Aisuan,

Respondents.

Case No.: 2021-1049

**RESPONDENTS MONTEREY
GRAND MANOR OWNERS
ASSOCIATION, DALE MILLIGAN,
SUSAN MOORE, RICHARD
JAGODZINSKI, AND SATURDAY
AISUAN'S ANSWER TO
COMPLAINT FOR DISCIPLINARY
ACTION**

**Stacked Hearing Dates:
December 6-8, 2022**
**Stacked Hearing Time:
9:00 a.m.**

PLEASE TAKE NOTICE that Jorge A. Ramirez, Esq. and Jessica L. Beeler, Esq. of the law firm of Wilson, Elser, Moskowitz, Edelman & Dicker, LLP, hereby appears as counsel for Respondents, Monterey Grand Manor Owners Association ("MGMOA"), Dale Milligan, Susan Moore, Richard Jagodzinski, and Saturday Aisuan in their capacity as Board members (collectively, "Respondents") in the above-entitled action and files their Answer to the Complaint for Disciplinary Action filed August 10, 2022.

JURISDICTION AND NOTICE

1. Answering Paragraph 1 of Petitioner's Complaint on file herein, Respondents admit that Dale Milligan, Susan Moore, Richard Jagodzinski, and Saturday Aisuan have served as members of the Board of MGMOA. As to the timing, Richard Jagodzinski was previously on the Board prior to 2021, was not on the Board at any point during 2021, and re-joined the Board in January 2022. Dale Milligan and Saturday Aisuan became Board members for the first time in

1 January 2022 and they continue to serve on the Board. Susan Moore was on the Board for many
2 years and resigned in April 2022.

3 2. Answering Paragraph 2 of Petitioner's Complaint on file herein, Respondents admit
4 the allegations therein.

5 **FACTUAL ALLEGATIONS**

6 3. Answering Paragraph 3 of Petitioner's Complaint on file herein, Respondents admit
7 the allegations therein.

8 4. Answering Paragraph 4 of Petitioner's Complaint on file herein, Respondents admit
9 that Dale Milligan, Susan Moore, Richard Jagodzinski, and Saturday Aisuan have served as
10 members of the Board of MGMOA. As to the timing, Richard Jagodzinski was previously on the
11 Board prior to 2021, was not on the Board at any point during 2021, and re-joined the Board in
12 January 2022. Dale Milligan and Saturday Aisuan became Board members for the first time in
13 January 2022 and they continue to serve on the Board. Susan Moore was on the Board for many
14 years and resigned in April 2022.

15 5. Answering Paragraph 5 of Petitioner's Complaint on file herein, Respondents admit
16 that a reserve study was prepared on October 31, 2015, and again on December 31, 2021 and
17 believed that MGMOA's former property manager had complied with all requirements related
18 thereto. Respondents admit that the Board in 2021 did not respond to the Division's requests for
19 information in 2021. Respondents lack sufficient information to admit or deny the remaining
20 allegations, and therefore deny them on that basis.

21 6. Answering Paragraph 6 of Petitioner's Complaint on file herein, Respondents admit
22 that an audit was completed on October 4, 2018. Respondents lack sufficient information to admit
23 or deny the remaining allegations, and therefore deny them on that basis.

24 7. Answering Paragraph 7 of Petitioner's Complaint on file herein, Respondents lack
25 sufficient information to admit or deny the remaining allegations, and therefore deny them on that
26 basis.

27 8. Answering Paragraph 8 of Petitioner's Complaint on file herein, Respondents admit
28 the allegations therein.

1 18. Answering Paragraph 18 Petitioner's Complaint on file herein, the allegations
2 consist of legal conclusions to which no response is required.

3 DATED this 9th day of September, 2022.

4 By: */s/ Jessica L. Beeler, Esq.*

5 **JORGE A. RAMIREZ, ESQ.**

Nevada Bar No. 6787

6 **JESSICA L. BEELER, ESQ.**

Nevada Bar No. 15387

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Attorneys for Respondent

10 *Monterey Grand Manor Owners Association, and*
11 *Dale Milligan, Susan Moore, Richard Jagodzinski,*
12 *and Saturday Aisuan in their capacity as Board*
13 *members*

14 */s/ Dale Milligan*

15 **Dale Milligan, Board President**

16 **Monterey Grand Manor Owners Association**

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1 CERTIFICATE OF SERVICE

2 I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and
3 that on this 9th day of September, 2022, I served **RESPONDENTS MONTEREY GRAND**
4 **MANOR OWNERS ASSOCIATION, DALE MILLIGAN, SUSAN MOORE, RICHARD**
5 **JAGODZINSKI, AND SATURDAY AISUAN’S ANSWER TO COMPLAINT FOR**
6 **DISCIPLINARY ACTION** as follows:

7 by placing same to be deposited for mailing in the United States Mail, in a sealed
8 envelope upon which first class postage was prepaid in Las Vegas, Nevada (**as**
9 **indicated below**);

10 via electronic means by operation of the Court’s electronic filing system, upon
11 each party in this case who is registered as an electronic case filing user with the
12 Clerk; and pursuant to Rule 9 of the N.E.F.C.R. (**as indicated below**);

13 via hand-delivery to the addressees listed below (**as indicated below**);

14 via facsimile (**as indicated below**);

15 by transmitting via email the document listed above to the email address set forth
16 below on this date before 5:00 p.m. (**as indicated below**).

17 VIA U.S. MAIL & FAX

18 REAL ESTATE DIVISION
19 DEPARTMENT OF BUSINESS AND
20 INDUSTRY, STATE OF NEVADA
21 Sharath Chandra, Administrator
22 3300 W. Sahara Ave., #350
23 Las Vegas, NV 89102
24 Telephone: (702) 486-4033

17 VIA E-MAIL

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27 /s/ Joyce L. Radden

28 An Employee of
WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP