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**ANSWER**  
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*Rancho San Juan Homeowners Association*

**FILED**  
JUN 07 2022  
NEVADA COMMISSION FOR  
COMMON INTEREST COMMUNITIES  
AND CONDOMINIUM HOTELS  
*Kelly Valadez*

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

Sharath Chandra, Administrator,  
Real Estate Division, Department of  
Business & Industry, State of Nevada,  
  
Petitioner,  
  
vs.  
  
Rancho San Juan Homeowners  
Association, Christopher Seckler,  
Sebastian Mayo, and Cesar Valdez  
  
Defendants.

CASE NO. 2021-161  
  
**ANSWER OF  
RANCHO SAN JUAN HOA  
TO COMPLAINT**

Respondent, RANCHO SAN JUAN HOMEOWNERS ASSOCIATION, by and through their attorneys of record, Boyack Orme Anthony & McKiever, and for its Answer to Petitioner's Complaint, admits, denies and alleges as follows.

**JURISDICTION AND NOTICE**

1. In answering paragraphs 1 and 2 of the Complaint, Respondent admits the allegations contained therein.

**FACTUAL ALLEGATIONS**

2. In answering paragraphs 3 and 4 of the Complaint, Respondent admits the allegations contained therein.

1            3.        In answering paragraphs 5 through 20, Respondent is without sufficient  
2 information or belief to admit or deny these allegations, and therefore denies the allegations  
3 contained therein.

4            4.        In answering paragraphs 21 through 25 of the Complaint, Respondent admits the  
5 allegations contained therein.

6            5.        In answering paragraphs 26 through 28, Respondent is without sufficient  
7 information or belief to admit or deny these allegations, and therefore denies the allegations  
8 contained therein.

9    **VIOLATIONS OF LAW**

10            6.        In answering paragraphs 29 through 34 of the Complaint, Respondent denies the  
11 allegations contained therein.

12  
13            WHEREFORE, Respondent prays that no disciplinary action be imposed upon the  
14 Respondent as an entity.

15    DATED June 7, 2022

16    BOYACK ORME ANTHONY & McKIEVER

17    By: **PATRICK ORME**  
18    EDWARD D. BOYACK, ESQ.  
19    Nevada Bar No. 5229  
20    PATRICK A. ORME, ESQ.  
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24    *Attorneys for Respondent*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 7, 2022, service of the foregoing **ANSWER OF RANCHO SAN JUAN TO COMPLAINT**, was made this date via e-mail to:

Kelly Valadez  
[KValadez@red.nv.gov](mailto:KValadez@red.nv.gov)  
Nevada Real Estate Division, Commission Coordinator

Virginia Tomova, Esq.  
[Vtomova@ag.nv.gov](mailto:Vtomova@ag.nv.gov)  
Deputy Attorney General, Division of Business and Industry

By: /s/ Patrick Orme  
An Employee of Boyack Orme Anthony & McKiever