

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

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

Case No. 2021-761 and 2021-696

Petitioner,

FILED

vs.

NOV 29 2022

Dayton Valley Community Association,
Dennis Drury, Carla Cole, Sandy Mass,
Joan Latimer, Steve Gallisdorfer, James
Kepler, Michelle Carr,

NEVADA COMMISSION FOR
COMMON INTEREST COMMUNITIES
AND CONDOMINIUM HOTELS

Mgalle

Respondents.

ERRATA TO RESPONSE TO COMPLAINT FOR DISCIPLINARY ACTION

Respondents, Dayton Valley Community Association (“DVCA”), Dennis Drury, Carla Cole, Sandy Mass, Joan Latimer, Steve Gallisdorfer, James Kepler and Michel Carr (collectively “Respondents”), by and through their attorneys, Gayle A. Kern, Esq., of Leach Kern Gruchow Anderson Song, hereby submit their Errata to Response to the Commission's Complaint for Disciplinary Action (“Complaint”) filed November 3, 2022.

The following paragraphs should be substituted for the corresponding paragraphs in the Response.

11. Answering Paragraph 11 or the Complaint, Respondents allege that according to the public records, Reliance Golf Management LLC was the Manager of the limited liability company known as Tour Specs Golf Management, LLC and Respondent Jim Kepler is one of the Managers of the limited liability company known as Reliance Golf Management Dayton Valley Management, LLC (CICC0198-0190) and denies the allegations of Paragraph 11 that are inconsistent with this information. Respondents allege that under Nevada law, Managers are not necessarily managing members and to be a Manager does not require the person be a member of the limited liability company. Respondents allege that all of the limited liability companies

1 relevant to the Dayton Valley Golf Course are managed by Managers, not managing members.
2 Respondents allege Respondent Kepler is employed by Tour Specs as the Employee Manager.
3 All members of Tour Specs Golf Management, LLC are private investors and Respondent Kepler
4 is not an investor or member of Tour Specs Golf Management, LLC.

5
6 12. Answering Paragraph 12 of the Complaint, Respondents deny the allegations.
7 Respondents allege Respondent Kepler is not a member of Tour Specs Golf Management, LLC.
8 Respondents allege that under Nevada law, Managers are not necessarily managing members and
9 to be a Manager does not require the person be a member of the limited liability company.
10 Respondents allege that all of the limited liability companies relevant to the Dayton Valley Golf
11 Course are managed by Managers, not managing members.

12 Pursuant to NRS 239B.030 and 603A.040, the undersigned does hereby affirm that the
13 *Errata to Response to Complaint for Disciplinary Action*, filed in the above-entitled case (Case
14 No. 2021-761 and 2021-696) does not contain the social security number of any person.

15
16 DATED this 29th day of November 2022.

17
18 **LEACH KERN GRUCHOW ANDERSON SONG**

19 By /s/ Gayle A. Kern

20 Gayle A. Kern, Esq.

21 Nevada Bar No. 1620

22 5421 Kietzke Lane, Ste. 200

23 Reno, Nevada 89511

24 Tel: 775-324-5930

25 Email: gkern@lkglawfirm.com

26 Attorneys for Dayton Valley Community Association
27
28