

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 9. Answering Paragraph 9 of Petitioner's Complaint on file herein, Respondents admit  
2 that the Board members did not respond to the Division's request for documents in 2021.

3 10. Answering Paragraph 10 of Petitioner's Complaint on file herein, Respondents  
4 admit the allegations therein.

5 11. Answering Paragraph 11 of Petitioner's Complaint on file herein, Respondents  
6 admit that the Board members did not respond to the Division's request for documents in 2021.

7 12. Answering Paragraph 12 of Petitioner's Complaint on file herein, other than Dale  
8 Milligan's response to the Notice of Complaint from August 2021, Respondents admit the  
9 allegations therein.

10 13. Answering Paragraph 13 of Petitioner's Complaint on file herein, Respondents  
11 admit the allegations therein.

12 **VIOLATIONS OF LAW**

13 14. Answering Paragraph 14 of Petitioner's Complaint on file herein, the allegations  
14 consist of legal conclusions to which no response is required.

15 15. Answering Paragraph 15 of Petitioner's Complaint on file herein, the allegations  
16 consist of legal conclusions to which no response is required.

17 16. Answering Paragraph 16 Petitioner's Complaint on file herein, the allegations  
18 consist of legal conclusions to which no response is required.

19 17. Answering Paragraphs 17 Petitioner's Complaint on file herein, the allegations  
20 consist of legal conclusions to which no response is required.

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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 9<sup>th</sup> 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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10 ***Attorneys for Respondent***

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

13  
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 9<sup>th</sup> 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

25 **VIA E-MAIL**

26 AARON D. FORD  
27 Attorney General  
28 Virginia T. Tomova, Esq.  
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*Attorneys for Real Estate Division*

29 /s/ Joyce L. Radden

30 An Employee of  
31 WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP