

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

ANSWER
Edward D. Boyack, Esq.
Nevada Bar No. 5229
Patrick A. Orme, Esq.
Nevada Bar No. 7853
BOYACK ORME ANTHONY & MCKEIVER
7432 W. Sahara Ave., Suite 101
Las Vegas, Nevada 89117
Tel: (702) 562-3415
Fax: (702) 562-3570
Ted@BoyackLaw.com
Patrick@Boyacklaw.com
Attorney for Respondent
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
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

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
Nevada Real Estate Division, Commission Coordinator

Virginia Tomova, Esq.
Vtomova@ag.nv.gov
Deputy Attorney General, Division of Business and Industry

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