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NEVADA COMMISSION FOR  
COMMON INTEREST COMMUNITIES  
AND CONDOMINIUM HOTELS

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

9 SHARATH CHANDRA, ADMINISTRATOR,	)	
10 REAL ESTATE DIVISION, DEPARTMENT OF	)	CASE NO.: 2024-183
11 BUSINESS AND INDUSTRY, STATE OF	)	
12 NEVADA,	)	
	)	<b>SUPPLEMENT TO</b>
13                                    Petitioner,	)	<b>ANSWER TO COMPLAINT</b>
vs.	)	<b>FOR DISCIPLINARY</b>
	)	<b>ACTION</b>
14 CENTERTOWNE SUBDIVISION	)	
15 ASSOCIATION	)	
(Entity Number C4164-1978),	)	
	)	
16                                    Respondent.	)	
	)	

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18           The Respondent, Centertowne Subdivision Association (hereinafter "Association"  
 19 or "Respondent"), hereby submits this supplement to its answer to the Real Estate  
 20 Division, the Department of Business and Industry, State of Nevada (hereinafter  
 21 "Division") Complaint for disciplinary action and notice of hearing:

22 **JURISDICTION AND NOTICE**

23           Respondent acknowledges that the Division and the Commission for Common-  
 24 Interest Communities and Condominium Hotels has jurisdiction over both the Association  
 25 and the subject matter at issue herein.

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2. There are currently three (3) Board Members for the Association.
3. The Board has consulted with management and its new general counsel regarding the election process going forward for the Board of Directors.
4. Each homeowner/member of the Association now has access to the online portal to verify document retention.
5. Documents are being maintained by current management and the Board has access to verify such record keeping.
6. Carson Valley Accounting has been engaged to complete the financial reviews going forward.
7. Compliance inspections are being conducted by the new management company.
8. The Reserve Study was updated and the Board met with the Reserve Specialist for clarification and adherence to the law going forward.
9. The Association has ensured it is now covered by all required insurance under the law, which was obtained through a new insurance agent.
10. Steps have been taken to reduce operating expenses appropriately to assist in funding Reserves.
11. The 2025 Budget will include the required Reserve contributions to increase the level of funding as identified in the audit.

The Association is also open to discussing additional items that should be added to this plan in order to fully and completely resolve this matter with the Division.

**CONCLUSION**

Respondent generally acknowledges technical violations of NRS Chapter 116 and NAC Chapter 116 as iterated above but submits that there was not a breach of fiduciary duties by any Board Member nor should there be any personal liability for any Board Member. The Board looks forward to resolution of this matter with the Division via its proposed plan and working with its new management to enact this plan.

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1 Dated: November 22, 2024.

2 **MADDOX, SEGERBLOM AND CANEPA, LLP**

3  
4 By: /s/ Eva G. Segerblom  
5 Eva G. Segerblom, Esq. NV Bar 10749  
6 Ardea G. Canepa-Rotoli, Esq. NV Bar 12345  
7 10403 Double R Blvd  
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9 **Attorneys for Centertowne Subdivision**  
10 **Association**

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**INDEX OF EXHIBITS**

<b>Exhibit Number</b>	<b>Description</b>	<b>Number of Pages</b>
1	Centertowne Subdivision Association Reserve Study Update for the year beginning January 1, 2024 and 2025 Budget Spreadsheet	33
2	Workers Compensation and Employers' Liability Insurance Policy Information Page	1

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I hereby certify that I am an employee of the law firm of  
3 MADDOX, SEGERBLOM & CANEPA, LLP and that on this date I served a true and correct  
4 copy of the herein document by ( ) E filing Notification by ( ) fax transmission with  
5 confirmation of receipt; ( X ) email transmission; or ( ) depositing addressed sealed  
6 envelopes with U.S. first-class postage, in the U.S. Mail at Reno, Nevada, addressed and  
7 as follows:

8 COMMON-INTEREST COMMUNITIES 9 AND CONDOMINIUM HOTELS 10 Attn: Commission Coordinator 11 3300 W. Sahara Avenue, Ste. 350 12 Las Vegas, Nevada 89102 13 <u>mgallo@red.nv.gov</u>	14 Christal P. Keegan, Esq. 15 Deputy Attorney General 16 5420 Kietzke Lane, Ste. 202 17 Reno, Nevada 89511 18 <u>ckeegan@ag.nv.gov</u>
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19 Dated: November 22, 2024.

20 /s/ Elaine McQuillan  
21 An employee of  
22 Maddox, Segerblom and Canepa, LLP  
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