

1 Specifically, Respondent alleges that these Audits were subsequently finalized and adopted
2 by the Board and were provided to the Division on April 23, 2024, as an enclosure to its Response
3 to Compliance Audit Investigator II, Vanessa Ward (“Response”). See EXHIBIT 1, 2020 Final
4 Audit, and EXHIBIT 2, 2021 Final Audit.

5 Respondent further alleges that the 2020 Draft Audit and 2021 Draft Audit were not
6 finalized due to a procedural error, in that the Association’s management company erroneously
7 neglected to return the signed Letter of Representation to the CPA which must be executed by the
8 Board in order to prompt the CPA to provide the final copy of the audit to the Association.

9 The Association further alleges that the 2020 and 2021 Audit did not find any fraudulent
10 information and that there has been no harm to the Association.

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12 3. Answering Paragraph 3 of the Complaint, Respondent admits the 2022 Audit was
13 not timely completed. As of the time the Complaint was filed, this issue was resolved, as the
14 Division was in receipt of the 2020 and 2021 Final Audits, both of which did not find any
15 fraudulent information.

16 Specifically, Respondent alleges that the 2022 Audit was completed on or about June 10,
17 2024. See EXHIBIT 3, 2022 Final Audit. Respondent further alleges that the 2022 Audit did not
18 find any fraudulent information, and that there has been no harm to the Association.

19 Further, as evidence that the Board and management have taken affirmative steps to correct
20 this issue moving forward, Respondent shows that the 2023 Final Audit has been completed and
21 is attached as EXHIBIT 4.

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23 4. Answering Paragraph 4 of the Complaint, Respondent admits that the 2019 CPA
24 Audit was approved in May 2022. Respondent alleges that this allegation regarding the untimely
25 adoption of the 2019 Audit was not included in the Division’s Investigation as evidenced in the
26 March 26, 2024 correspondence from Investigator Wheaton. See EXHIBIT 5.
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1 Respondent alleges that it has taken affirmative steps to correct this issue as evidenced by
 2 the Board’s August 12, 2024 approval of an amended 2024 Budget, which was ratified by the
 3 membership on August 28, 2024. See EXHIBIT 6. In addition, reference is made to the 2025
 4 Budget, attached as EXHIBIT 7 which establishes that the Board is correcting and improving the
 5 Association’s financial position.

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 7 10. Answering Paragraph 10 of the Complaint, Respondent admits that in 2022, two
 8 separate budgets were provided to the Division, indicating different budget information.
 9 Respondent alleges that the Association’s management company supplied said records to the
 10 Division, and that the Board did not have any direct communications with the Division regarding
 11 these Budgets. Respondent further alleges that despite providing the Division with different
 12 Budgets, the Owners were properly billed the amounts included in the final approved budget.

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 14 11. Answering Paragraph 11 of the Complaint, Respondent admits that the 2023
 15 Reserve Budget lists the reserve special assessment contribution as an “Other Expense.”

16 Respondent alleges that the 2024 Reserve Budget correctly lists the Reserve Contribution
 17 as Investment Income and that this issue has been resolved. See EXHIBIT 6, a snippet of which is
 18 below:

Mon Jul 29 2024 02:44 pm User: 53300
 Report: dwr_bx_spread_report_by_dept
 Budget: 2444

**Spread Report
 Clearacre
 Reserves
 2024 Budget - REVISED**

Description	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Investment Income													
4905 – Reserve Contribution Income	9,167	9,166	9,167	9,167	9,166	9,167	9,167	9,166	7,917	7,917	7,917	7,917	105,001
4906 – Reserve Contribution Income 2	13,917	13,916	13,917	13,917	13,916	13,917	13,917	13,916	13,917	13,917	13,916	13,917	167,000
4910 – Interest Earned - Reserve Accounts	0	0	0	0	0	0	0	0	250	250	250	250	1,000
Total Investment Income	23,084	23,082	23,084	23,084	23,082	23,084	23,084	23,082	22,084	22,084	22,083	22,084	273,001
Total Reserves Income	23,084	23,082	23,084	23,084	23,082	23,084	23,084	23,082	22,084	22,084	22,083	22,084	273,001

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 25 12. Answering Paragraph 12 of the Complaint, Respondent admits that it stated in its
 26 Response to Allegation 2, pertaining to 2021 and 2022 budget ratification packages and 2022
 27 budget ratification meeting minutes, that there were errors in certain information that was sent out
 28

1 to the Owners.

2 Respondent alleges that the Owners have been billed the amounts included in the final
3 budgets and, on information and belief, no complaints have been received from any of the Owners
4 regarding the process or the charges each year.

5 13. Answering Paragraph 13 of the Complaint, Respondent admits to issues with proper
6 record keeping.

7
8 Respondent alleges that the Board understands that it has fiduciary duties to the
9 Association. Respondent alleges that the main contributing factor for the record keeping issues is
10 the fact that the Association has gone through multiple management companies with multiple
11 community manager changes during the period at issue, but that the Association and its
12 management company are correcting the issue and have modified its record keeping practices to
13 comply with Nevada law.

14
15 **C. Failure to Adequately Contribute to Reserve Account**

16 14. Answering Paragraph 14 of the Complaint, Respondent admits this allegation.

17 Respondent alleges that in order to correct this issue, it has retained Better Reserve
18 Consultants, LLC (“BRC”) to complete an updated Reserve Study (EXHIBIT 8) and based on that,
19 completed its 2025 Budget. *See* EXHIBIT 7.

20 15. Answering Paragraph 15 of the Complaint, Respondent admits this allegation.

21 Respondent alleges that the Board is correcting this issue by working with its Reserve
22 Study Specialist, BRC, and that an updated Reserve Study and Funding Plan has been completed
23 and the Association is working toward adequately funding its reserves. *See* EXHIBIT 8 (Updated
24 Reserve Study) and EXHIBIT 7 (2025 Budget). The Association’s funding plan brings the reserve
25 balance to over 70% funded by 2028 and it will continue to grow thereafter. *See* EXHIBIT 8,
26 page 31.
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1 16. Answering Paragraph 16 of the Complaint, Respondent admits this allegation.
2 Respondent alleges that the Board has corrected this issue and presently the deferred
3 contributions to reserves are currently being tracked on the Association’s financial reports. *See*
4 EXHIBIT 9 (July Financials) and EXHIBIT 10 (August Financials).

5 17. Answering Paragraph 17 of the Complaint, Respondent admits this allegation.
6 Respondent alleges that it has corrected this issue, and its current management company is
7 consistently showing all deferred contributions as an obligation owed to the Reserves. *See*
8 EXHIBIT 9 (July Financials) and EXHIBIT 10 (August Financials).

9 18. Answering Paragraph 18 of the Complaint, Respondent admits this allegation.
10 Respondent alleges that there has been a subsequent change in management companies and
11 this issue has been corrected.

12 19. Answering Paragraph 19 of the Complaint, Respondent admits this allegation.
13 Respondent alleges this issue has been addressed and the financials prepared by its current
14 management company accurately reflect the due to/from amounts. *See* EXHIBIT 9 (July
15 Financials) and EXHIBIT 10 (August Financials).

16 20. Answering Paragraph 20 of the Complaint, Respondent admits that it stated in its
17 Response to Allegation 2, pertaining to budgeting practices resulting in variances and net losses,
18 that there were problems with poor recordkeeping and regularly transferring reserves. Respondent
19 further alleges it has made changes to its practices to correct the situation moving forward.

20 **D. Frequency Shortcomings of Executive Session Meetings**

21 21. Answering Paragraph 21 of the Complaint, Respondent admits that the Audit states
22 that it appears the Association held only one executive session meeting of the executive board in
23 2021.

24 Respondent alleges that NRS 116.31083 does not require a certain number of executive
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1 session meetings, but identifies that Board may meet in executive session only to discuss the
2 limited topics permitted under NRS 116.31085. Rather, subsection 1 of NRS 116.31083 requires
3 that the Board meet “at least once every quarter, and not less than once every 100 days.” Due to
4 the multiple transitions between managers within the same management company as well as
5 management company changes, there has been a lack of proper record keeping and most of the
6 records are unable to be located.

7
8 22. Answering Paragraph 22, Respondent admits that it stated in its Response that
9 Meeting Minutes were missing for (a) the October 25, 2021 Executive Session; (b) November 15,
10 2021 Budget Ratification; and (c) 2021 and 2022 Annual Unit Owner’s Meeting.

11 Respondent alleges, on information and belief, that despite not having records of minutes,
12 meetings occurred. Respondents further alleges that the primary cause for the record keeping
13 issues is the fact that the Association has gone through multiple management companies with
14 multiple community manager changes during the period at issue. The Association engaged a new
15 management company which is working to correct future practices and ensure proper
16 recordkeeping in accord with Nevada law.

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18 23. Answering Paragraph 23, Respondent admits it stated in its Response there were
19 shortcomings in meeting minute record keeping. The Association engaged a new management
20 company which is working to correct future practices and ensure proper recordkeeping in accord
21 with Nevada law.

22
23 **E. Delinquent Omitted Invoices, Receipts, Check Images and Electronic
24 Payments.**

25 24. Answering Paragraph 24, Respondent responds as follows:

26 a. Respondent admits that it did not provide the AvidPay Log for 2021-22
27 during the Audit. Respondent alleges that the AvidPay Log was provided to the Division on April
28 29, 2024 as part of its Supplement to Investigator Ward. *See* EXHIBITS 11 and 12. Respondent

1 further alleges that the Division was provided with evidence of dual approval for each of the checks
2 identified in the 2021-2022 AvidPay log on September 11, 2024. *See* EXHIBIT 13 (Supplemental
3 Response Letter to NRED) and EXHIBIT 14 (Evidence of dual approval provided on 09.11.24).

4 b. Respondent admits that it did not provide the 2021 and 2022 check images
5 during the Audit. Respondent alleges that copies of both the front and back of the checks for the
6 same time period were, in fact, provided to the Division on April 29, 2024 as part of its Supplement
7 to Investigator Ward. *See* EXHIBIT 11 and EXHIBIT 15 (Check copies). Therefore, at the time
8 the Complaint was filed, this matter was fully resolved.

9
10 c. Respondent admits that it did not provide 2021-2022 invoices and receipts
11 for Eugene Burger Management (EBMC) during the Audit. However, Respondent alleges that the
12 invoices were, in fact, provided to the Division on April 23, 2024, as part of its Response. *See*
13 EXHIBIT 16 (04.23.24 Response) EXHIBIT 17 (2021 and 2022 Invoices). Therefore, this matter
14 was fully resolved prior to the time the Complaint was filed.

15
16 d. Respondent admits that it did not provide the 2021 and 2022 budget
17 ratification packages and asserts that these records cannot be located.

18 **F. Inadequate Insurance Crime Policy**

19 25. Paragraph 25 of the Complaint does not require a response because the document
20 speaks for itself.

21
22 26. Paragraph 26 of the Complaint does not require a response because the document
23 speaks for itself.

24 27. Answering Paragraph 27, Respondent admits this allegation. Respondent alleges
25 that it has obtained new crime insurance which is now in place. *See* EXHIBIT 18.

26 28. Answering Paragraph 28, Respondent admits that in its Response it stated that the
27 Board was unaware of their responsibility to maintain a certain level of crime insurance.
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1 Respondent alleges that the Board is now aware of its responsibilities and will review on at least
2 an annual basis and adjust their insurance coverage accordingly.

3 **G. Cash Balances Not Fully Insured**

4 29. Answering Paragraph 29, Respondent admits that its financial statements
5 demonstrated cash balances in 2023 that exceeded FDIC coverage limits. Respondent alleges that
6 the Association has since opened an Insured Cash Sweep (“ICS”) account, that the Association’s
7 funds are properly FDIC insured, and that this issue has been corrected. *See* EXHIBIT 19, which
8 is a true and correct copy of an email from management confirming an ICS account has been
9 opened. The Board is aware they need to review their cash balances at least once every 100 days
10 and adjust accordingly to ensure funds are properly insured.

11 30. Answering Paragraph 30, Respondent admits that as of August 31, 2023, the
12 maximum loss at risk was approximately \$84,239.

13 **VIOLATIONS OF LAW**

14 31. Answering Paragraph 31 of the Complaint, Respondent admits to a violation of
15 NRS 116.31144. Respondent alleges that it has taken affirmative steps to resolve this issue as
16 evidenced by the 2023 Final Audit. *See* EXHIBIT 4.

17 32. Answering Paragraph 32 of the Complaint, Respondent admits to a violation of
18 NAC 116.457.

19 33. Answering Paragraph 33 of the Complaint, Respondent admits to a violation of
20 NRS 116.3102(1)(b), to the extent this paragraph asserts Respondent did not properly maintain all
21 financial records.

22 34. Answering Paragraph 34 of the Complaint, Respondent admits to a violation of
23 NRS 116.31151, to the extent this paragraph asserts Respondent did not properly maintain all
24 financial records.

1 35. Answering Paragraph 35 of the Complaint, Respondent admits a violation of NRS
2 116.3103. Respondent further alleges that the executive board reasonably relied on its managers
3 and management companies to properly complete the administrative tasks of proper record
4 retention, which unfortunately did not happen through the multiple transitions between managers
5 and companies.

6 36. Answering Paragraph 36 of the Complaint, Respondent admits to a violation of
7 NRS 116.3115. Respondent further alleges that it has taken affirmative steps to resolve this issue
8 by complying with the Reserve Study Specialist’s Funding Plan in the updated Reserve Study to
9 work toward adequately funding the Reserves. *See* EXHIBIT 8.

10 37. Answering Paragraph 37 of the Complaint, Respondent admits to a violation of
11 NAC 116.415.

12 38. Answering Paragraph 38 of the Complaint, Respondent admits to a violation of
13 NRS 116.30183.

14 39. Answering Paragraph 39 of the Complaint, Respondent admits to a violation of
15 NRS 116.3018.

16 40. Answering Paragraph 40 of the Complaint, Respondent offers a qualified admission
17 of a violation of NRS 116.31153. Respondent admits that as of the date the Complaint was filed,
18 Respondent had not provided the necessary proof to show the two-approval process was followed.
19 However, this has been remedied and proof of the proper approval process has been supplied and
20 is also enclosed for review by the Commission. *See* EXHIBIT 15.

21 41. Answering Paragraph 41 of the Complaint, Respondent offers a qualified admission
22 of a violation of NAC 116.405(5). Respondent admits that as of the date the Complaint was filed,
23 Respondent had not provided the necessary proof to show the two approval process was followed
24 However, this has been remedied and proof of the proper approval process has been supplied and
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1 is also enclosed for review by the Commission. *See* EXHIBIT 14.

2 42. Answering Paragraph 42 of the Complaint, Respondent admits to a violation of
3 NRS 116.3113(1)(c). Respondent alleges that it has obtained new crime insurance which is now
4 in place. *See* EXHIBIT 18.

5 43. Answering Paragraph 43 of the Complaint, Respondent admits to a violation of
6 NRS 116.311395(2). Respondent alleges that all Association opened an ICS account in order to
7 ensure its funds are FDIC insured. *See* EXHIBIT 19.
8

9 **LIST OF WITNESSES**

10 1. Terry Wheaton, Chief Compliance Audit Investigator
11 State of Nevada Department of Business and Industry
12 Real Estate Division
13 3300 West Sahara Avenue, Suite 350
14 Las Vegas, NV 89102

15 Relevance of Testimony: Mr. Wheaton will testify as to the investigation conducted and
16 the information included and not included in the review by the Division. Mr. Wheaton will review
17 the exhibits provided with the Response and detail the conclusions reached by the Division.

18 2. Joe Lopez, CAM
19 Associa Sierra North
20 10509 Professional Cir. #200
21 Reno, NV 89521

22 Relevance of Testimony: Mr. Lopez will address the exhibits included in this Response
23 and provide relevant testimony regarding the allegations made by the Division.

24 Yau Lau
25 c/o Leach Kern Gruchow Song
26 5421 Kietzke Lane, Suite 200
27 Reno, NV 89511

28 3. Relevance of Testimony: Mr Lau will address the exhibits included in this
Response and provide relevant testimony regarding the allegations made by the Division

4. Respondent reserves the right to call other witnesses regarding this matter,

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including any Respondent or other individual with relevant information.

DISCIPLINE AUTHORIZED

With respect to the “Discipline Authorized,” Respondent acknowledges that the Commission has the authority to impose sanctions set forth therein.

PROPOSED RESOLUTION/SETTLEMENT

A. The Association has brought all violations into compliance.

As set forth below, all violations have been addressed. The Association is prepared to cooperate with any further requests by the Division or Commission to establish continued compliance.

1. Audits: The Board and management have been advised of the importance of ensuring that the annual audits are completed in a timely manner in accordance with Nevada law, including following through and returning an executed Letter of Representation in order to receive the final copy of the Audit, which attributed to the prior untimely completion of audits.

2. Budgets and Reserve Studies: Enclosed for the Commission’s review is the 2025 Budget which was drafted to ensure the Association would be able to adhere to the proposed funding plan for 2025 to 2028. Assuming no unforeseen changes in expenses, the assessment level in the budget could potentially remain the same for the upcoming four years and the Association would be able to properly follow the plan herein. *See* EXHIBIT 7 (2025 Budget) and EXHIBIT 8 (2025 Reserve Study, page 31).

3. Crime Insurance: The Association is cognizant that it needs to ensure their Crime Insurance is at an amount that covers three months of assessments plus the amount in their reserve account in accord with Nevada law. The Association will be reviewing this on an annual

1
2 basis, during the budget process, and will make adjustments accordingly to comply with Nevada
3 law.
4

5 4. Insuring Cash Balances: The Board is aware of their fiduciary duty to ensure all
6 funds are properly covered by FDIC, or equivalent, and with opening of the ICS account are now
7 in compliance.
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9 **B. Compliance with Nevada law through a Funding Plan.**

10 NRS 116.3115(2) provides, in pertinent part, as follows (emphasis added):
11

12 (b) The association shall establish adequate reserves, funded on a reasonable
13 basis, for the repair, replacement and restoration of the major components of the
14 common elements and any other portion of the common-interest community that
15 the association is obligated to maintain, repair, replace or restore. . . *The*
16 *association may comply with the provisions of this paragraph through a funding*
17 *plan that is designed to allocate the costs for the repair, replacement and*
18 *restoration of the major components of the common elements* and any other
19 portion of the common-interest community that the association is obligated to
20 maintain, repair, replace or restore *over a period of years if the funding plan is*
21 *designed in an actuarially sound manner which will ensure that sufficient money*
22 *is available when the repair, replacement and restoration of the major*
23 *components of the common elements* or any other portion of the common-interest
24 community that the association is obligated to maintain, repair, replace or restore
25 are necessary. . .

26 Based on the express language of the statute, an association with an underfunded reserve
27 account is in compliance with the law, if the association’s board has adopted a “funding plan” that
28 is “designed in an actuarially sound manner which will ensure that sufficient money is available
when the repair, replacement, and restoration of the major components of the common elements .
. . are necessary.” The objective of a funding plan is to: (a) adequately fund the reserve account,
(b) address the current “due to/from” financial accounting entry, (c) address the scheduled reserve
study expenditures, and (d) comply with the maximum annual assessment increases permitted by
the Declaration.

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The proposed funding plan is based on the Association’s current financial position. A snippet of the proposed Funding Plan in the 2025 Full Reserve Study is below:

Recommended Reserve Contribution

Year Funded	Beginning of Year Balance	Spc Rsv Assessmt	Annual Transfer	Due to From Repayment	Annual Expenditures	Interest Earned	Income Tax	End of Year Balance	% Funded	Fully Funded (100%)
2024	\$299,908.23	\$167,000.00	\$110,000.00	\$0.00	\$121,700.00	\$2,999.00	\$899.70	\$457,307.53	38.07	\$1,201,373.05
2025	\$457,307.53	\$167,000.00	\$27,500.00	\$92,500.00	\$259,927.01	\$4,573.00	\$1,371.90	\$487,581.62	43.40	\$1,123,466.71
2026	\$487,581.62	\$167,000.00	\$27,500.00	\$92,500.00	\$267,786.31	\$4,876.00	\$1,462.80	\$510,208.51	48.84	\$1,044,589.64
2027	\$510,208.51	\$167,000.00	\$27,500.00	\$92,500.00	\$125,776.10	\$5,102.00	\$1,530.60	\$675,003.81	60.86	\$1,109,163.68
2028	\$675,003.81	\$167,000.00	\$27,500.00	\$92,500.00	\$145,190.64	\$6,750.00	\$2,025.00	\$821,538.17	70.78	\$1,160,728.81
2029	\$821,538.17	\$167,000.00	\$140,000.00	\$0.00	\$190,561.47	\$8,215.00	\$2,464.50	\$943,727.20	80.35	\$1,174,503.08

***The Reserve Annual Transfer has been reduced by \$92,500 per year (2025-2028) in order to fund the Due-to-From with the Operating Account. A Special Reserve Assessment has been levied in order to fund the reserve account.
 Better Reserve Consultants Version 1.06 - DRAFT November 14, 2024

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Respondent recognizes it needs to address its due to/from balance, which is mainly attributed to Respondent not properly raising the assessment amount to have sufficient funds to transfer to the reserves. To correct this issue, the Association’s updated 2024 Budget, which was ratified by the membership on August 28, 2024, increased assessments for the remainder of the fiscal year by approximately 47% from \$390 per unit, per month, to \$542 per unit, per month. In addition, there is a special reserve assessment included in the amount of \$221 per unit, per month.

Respondent does not presently have the funds in its operating account to fully pay the due to/from balance. In order to address this, the new and updated funding plan recognizes and acknowledges the Association’s current financial position. The Association’s Reserve Annual Transfer has been reduced by \$92,500 per year for years 2025, 2026, 2027 and 2028 to fund the Due -to-From balance in the operating account. A Special Reserve Assessment in the amount of \$167,000 will be assessed for these years to further fund the reserve account. This plan will bring the Association’s reserves to 73.32% funded by 2028. At which time, the Association will no longer need a Special Reserve Assessment and the Due to/from will have been paid in full and the regular reserve transfer will be adjusted accordingly.

The Association’s 2025 Budget is attached as EXHIBIT 7. This Budget contemplates a

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\$43.00 increase in the annual assessments from \$542 per unit, per month, to \$585 per unit, per month, in addition to the special reserve assessment in the amount of \$221 per unit, per month. The 2026, 2027 and 2028 Budgets will not require any further increases in annual assessments, barring any unforeseen changes in expenses, but will be reviewed annually by the Board as required and adopted and ratified per NRS 116.

The Association believes that if the Commission accepts this funding plan, the Association will be in compliance with NRS 116.3115(2).

Pursuant to NRS 239B.030 and 603A.040, the undersigned does hereby affirm that the *Amended Response to Complaint for Disciplinary Action*, filed in the above-entitled case (Case No. 2024-137 does not contain the social security number of any person.

DATED this 21th day of November, 2024.

LEACH KERN GRUCHOW SONG

By: /s/ Sophie A. Karadanis, Esq.
SOPHIE A. KARADANIS, ESQ.
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E-mail: skaradanis@lkglawfirm.com

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), the undersigned, an employee of LEACH KERN GRUCHOW SONG, hereby certified that on 22th of November, 2024, she served a true and correct copy of the foregoing, AMENDED RESPONSE TO COMPLAINT FOR DISCIPLINARY ACTION, by:

- Depositing for mailing, in a sealed envelope, U.S. postage prepaid, at Reno, Nevada
- Personal Delivery
- Facsimile
- Federal Express/Airborne Express/Other Overnight Delivery
- Reno Messenger Service
- Electronic Service – via E-Mail

Addressed as follows:

Aaron D. Ford, Esq.
 Attorney General
 Christal P. Keegan, Esq.
 Deputy Attorney General
 5420 Kiezke Lane, Suit 202
 Reno, NV 89511
Via Email: ckeegan@ag.nv.gov

Maria Gallo, Commission Coordinator
 Common-Interest Communities
 and Condominium Hotels
 3300 W. Sahara Avenue, Suite 350
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Via Email: mgallo@red.nv.gov

/s/ Michelle Goodell
 MICHELLE GOODELL

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