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NEVADA COMMISSION FOR  
COMMON INTEREST COMMUNITIES  
AND CONDOMINIUM HOTELS

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 13 *Quadro Homeowners' Association*

**BEFORE THE COMMISSION FOR COMMON-INTEREST COMMUNITIES AND  
CONDOMINIUM HOTELS**

**STATE OF NEVADA**

15 SHARATH CHANDRA, Administrator,	)	Case No.: 2023-580
16 REAL ESTATE DIVISION,	)	
17 DEPARTMENT OF BUSINESS &	)	
18 INDUSTRY, STATE OF NEVADA,	)	<b>QUADRO HOMEOWNERS'</b>
19 Petitioner,	)	<b>ASSOCIATION'S ANSWER TO</b>
20 -vs-	)	<b>PETITIONER'S COMPLAINT</b>
21 QUADRO HOMEOWNERS'	)	
22 ASSOCIATION, JONATHAN	)	
23 HAMRICK, ELENA LUNGU, RICHARD	)	
24 GREISENAUER, LINDA NEWPORT,	)	
25 and GENEVA MARCUS.	)	
26 Respondents.	)	

1 Respondents, QUADRO HOMEOWNERS ASSOCIATION (“Quadro”) and JONATHAN  
2 HAMRICK, ELENA LUNGU, LINDA NEWPORT and GENEVA MARCUS (collectively “Current  
3 Directors”) by and through its attorneys, CLARKSON MCALONIS & O’CONNOR, P.C. hereby  
4 respond to the Commission’s Complaint for Disciplinary Action (“Complaint”) filed on August 8,  
5 2024. Our office does not represent former Board member Richard Greisenauer in any capacity.  
6

7 **ANSWER**

8 Quadro and the Current Directors admit that the Commission for Common-Interest  
9 Communities and Condominium Hotels, State of Nevada has jurisdiction and is the proper venue to  
10 hear the Complaint. Quadro and the Current Directors neither admit nor contest the Factual  
11 Allegations set forth in the Commission’s Complaint for Disciplinary Action.  
12

13 Quadro and the Current Directors acknowledge the Violations of Law set forth in the  
14 Commission’s Complaint and have taken the following corrective actions. The Association opened  
15 an insurance claim (Claim No. ARCAN 23050018) on or about May 18, 2024, regarding the water  
16 leak which is the subject of the Division’s Complaint. North American Risk Services adjusted the  
17 claim and made the necessary repairs to the affected units.<sup>1</sup> Each of the affected units were repaired  
18 utilizing funds provided by the Association’s insurance provider. The repairs related to the underlying  
19 cause of the water leak were paid for utilizing Association funds as the issues related to drain/sewer  
20 line were not covered by insurance. Accordingly, neither Quadro nor the Current Directors  
21 reimbursed or otherwise paid for damage caused to Respondent Charles Griesenauer’s unit. As such,  
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27 \_\_\_\_\_  
28 <sup>1</sup> A sworn Declaration of the Association’s community manager, Ms. Mandy Endelman is attached hereto detailing the handling of this insurance claim and non-reimbursement of Richard Griesenauer. *See Exhibit A.*

1 Quadro and the Current Directors addressed the May 2023 water leak in accordance with the  
2 requirements of Nevada law and the Association's governing documents.

3 Next, as a result of issues created by the water leak discussed herein, a Petition to remove  
4 Richard Griesenauer was circulated, removal ballots were sent to the membership, and a recall election  
5 occurred on or about November 9, 2023.<sup>2</sup> The membership voted to remove Mr. Richard Griesenauer.  
6 As such, Respondent Richard Griesenauer is no longer on the Board of Directors and has not been on  
7 the Board of Directors since November 9, 2023, when he was removed from the Board of Directors  
8 in accordance with the procedures set forth in NRS 116.31036.  
9

10  
11 Lastly, the Association and its Board of Directors have been provided instruction by its  
12 retained professional regarding requirements related to association meetings and the noticing of  
13 meetings under emergency circumstances.  
14

15 **Proposed Resolution/Settlement**  
16

17 It is the sincere hope of Quadro, and the Current Directors that the Association and Current  
18 Directors will enter into a stipulated settlement agreement with the Division. Quadro and the Current  
19 Directors acknowledge that mistakes have been made and the Respondents represented in this Answer  
20 believe that they have taken appropriate corrective action to address those mistakes. The Respondents  
21 represented in this Answer are willing to take any mandated training that the Division desires and to  
22 reimburse the Division any costs and/or fees incurred as a result of the Division's investigation. Based  
23 upon these parameters along with the corrective actions taken by the Current Directors, Quadro and  
24

25  
26  
27 \_\_\_\_\_  
28 <sup>2</sup> The removal petition and meeting minutes reflecting Mr. Griesenauer's removal from the Board of Directors is attached  
hereto as Exhibit B.

1 the Current Directors respectfully request that the Division refrain from imposing any administrative  
2 fines upon Quadro or the Current Directors.

3  
4 DATED this 13<sup>th</sup> day of November 2024.

5 CLARKSON MCALONIS & O' CONNOR, P.C.

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**CERTIFICATE OF MAILING**

I, Ashley Livingston, certify that I am an employee of the law firm of Clarkson McAlonis & O'Connor, P.C., and that on November 13, 2024, I caused to be served a true and correct copy of the correspondence: **QUADRO HOMEOWNERS' ASSOCIATION'S ANSWER TO PETITIONER'S COMPLAINT.**

**Sent Via Electronic Mail**

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/s/ Ashley Livingston  
An employee of CLARKSON MCALONIS &  
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