

FILED

AUG 12 2025

NEVADA COMMISSION FOR  
COMMON INTEREST COMMUNITIES  
AND CONDOMINIUM HOTELS

mgallo

ANS  
LEACH KERN GRUCHOW SONG  
RYAN D. HASTINGS, ESQ.  
Nevada Bar No. 12395  
E-mail: [rhastings@lkglawfirm.com](mailto:rhastings@lkglawfirm.com)  
2525 Box Canyon Drive  
Las Vegas, Nevada 89128  
Telephone: (702) 538-9074  
Facsimile: (702) 538-9113

*Attorneys for Respondent*

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

SHARATH CHANDRA, Administrator,  
REAL ESTATE DIVISION,  
DEPARTMENT OF BUSINESS AND  
INDUSTRY, STATE OF NEVADA,

Case No.: 2024-606

Petitioner,

vs.

CHEYENNE PARK VILLAS  
HOMEOWNERS ASSOCIATION, INC.

Respondent.

**ANSWER TO COMPLAINT FOR DISCIPLINARY  
ACTION AND NOTICE OF HEARING**

The Respondent, CHEYENNE PARK VILLAS HOMEOWNERS ASSOCIATION, INC.  
("Respondent"), hereby submits this Answer to the Real Estate Division of the Department of  
Business and Industry, State of Nevada ("Division") Complaint for Disciplinary Action and  
Notice of Hearing ("Complaint").

**JURISDICTION AND NOTICE**

1. Respondent acknowledges that the Division and the Commission for Common-  
Interest Communities and Condominium Hotels has jurisdiction of this matter.

**FACTUAL ALLEGATIONS**

2. Respondent generally acknowledges and admits the factual allegations set forth in  
Paragraphs 1 through 41 of the Complaint.

...

LEACH KERN GRUCHOW ANDERSON SONG  
2525 Box Canyon Drive, Las Vegas, Nevada 89128  
Telephone: (702) 538-9074 – Facsimile (702) 538-9113

1 VIOLATIONS OF LAW

2 3. Respondent generally acknowledges and admits the factual allegations set forth in  
3 Paragraphs 42-62 of the Complaint.

4 DISCIPLINE AUTHORIZED

5 4. With respect to the "Discipline Authorized," the Respondent acknowledges that  
6 the Commission has the authority to impose the sanctions set forth therein.

7 PROPOSED RESOLUTION/SETTLEMENT

8 The Association, has obtained new management and legal counsel since the filing of the  
9 Complaint in this matter. Both management and legal counsel have been working with counsel  
10 for the Division, Ms. Keegan, with regard to crafting a proposed plan by which the Association  
11 can be brought into compliance. The Association is committed to the following actions which it  
12 understands the Division would find satisfactory and seeks the Commission's guidance as it  
13 relates to the specific commitments set forth below.

14 Violation #1: The Association is committed to obtaining 3 board members (by way of the  
15 Form 623 - change in Board and reporting the CAM), or advise of its efforts to obtain 3 board  
16 members by the September 2025 Commission hearings. Since the filing of the Complaint,  
17 management has secured one additional board member, so there are now currently 2 active board  
18 members of the Association. Carl Manthei was appointed to the board at the July 15, 2025 board  
19 meeting. Management is actively working on securing a third member of the Board, but it is  
20 important to note that the original board member, Mr. Pankey, directly owns (fully or partially)  
21 83 of the 92 units in this complex, so the owner pool is quite small. Additionally, the Board is in  
22 agreement to complete 1.5 Hours of Board Member CE training in Welcome to the Board.

23 Violation #2: Management has assisted the Association in obtaining a new bank signature  
24 card with AAB and a copy of the Association's Strongroom Payables Lockbox form/signature  
25 card. Invoices are uploaded to the Association's individual Strongroom portals in order to  
26 review & approve invoices. Once both board members have approved the invoices in the system,  
27 management is notified and then a check is authorized to be cut to the vendor with the board  
28

1 members' signatures imprinted on the check. The Association believes that these actions taken  
2 have resolved the concerns set forth in Violation #2 in the Complaint.

3 Violations #3 & 4: The Association will provide prior to the September Commission  
4 Hearings, the 2022 Annual Unit Owner's Meeting minutes, and management assures the  
5 Commission that meetings where decisions are being made are held with quorum and meetings  
6 are being held no more than 100 days apart pursuant to NRS 116.31083.

7 Violation #5, 11, 12, 13, 14, 15: The Association has provided the Division with updated  
8 Reserve Study and Funding Plan (demonstrating increase to annual assessments) in accordance  
9 with NRS 116.3115(2). Additionally, the Board agrees to the Division's demand that the Board  
10 complete 1.5 Hours of Board Member Training CE in the area of Reserve Studies.

11 Violation #6, 21: The Board is committed to completing 3 Hours of Board Member  
12 Training CE in the areas of: Budgeting and Financial Management in a CIC, and Fiduciary Duty  
13 in order to satisfy the concerns set forth in Violations #6 & 21.

14 Violation #7: The Board and management affirm that the Association will utilize licensed  
15 vendors, to include verifying licenses or securing contracts and bids before utilizing these vendor  
16 services, with reexamination of services from Peerless Cleaning, D&C Investments - Stacy  
17 Wilson, and to produce the checks and contracts related to these vendors as requested from the  
18 Investigator.

19 Violation #8: The Board and management are working towards producing finalized and  
20 adopted 2022 and 2023 Audits, and proof of affirmative steps to correct issues moving forward.

21 Violations #9, 10: The Board and management are working towards producing the  
22 Annual Budget Ratification Meetings for 2020, 2021, 2022 with proof of proper notice to the  
23 community (to include budget packets, right to vote on the budget, etc.), and assurances that the  
24 Association is conducting annual budget ratification meetings for the community.

25 Violations #16, 17, 18: The Association did not have directors and officers,  
26 crime/fidelity, cyber crime or work comp insurance policies when current management was  
27 engaged. The Association did have general liability and property coverage. Since the filing of the  
28 Complaint, management has assisted the Association in securing cyber crime, crime/fidelity &

1 work comp coverage and a cert of insurance for those policies has been provided to counsel for  
2 the Division. Additionally, management assisted the Board submit an application on an existing  
3 quote for directors and officers coverage and the policy premium for the year was paid in full on  
4 7/31/2025; proof of payment for this policy has been provided to counsel for the Division. The  
5 Association is awaiting the policy itself and a certificate of insurance, which the Association will  
6 provide once received. The Association now has all required coverages in accordance with  
7 statutory requirements.

8 **SCHEDULED HEARING**

9 5. The Association understands that this matter is placed on a stacked calendar to be  
10 heard on September 9-11, 2025, and will be available to answer any questions the Commission  
11 may have at that time.

12 DATED this 11th day of August, 2025.

13 LEACH KERN GRUCHOW SONG

14 By: /s/ Ryan D. Hastings  
15 RYAN D. HASTINGS, ESQ.  
16 Nevada Bar No. 12395  
17 2525 Box Canyon Drive  
18 Las Vegas, Nevada 89128

19 Attorneys for Respondent  
20  
21  
22  
23  
24  
25  
26  
27  
28

LEACH KERN GRUCHOW ANDERSON SONG  
2525 Box Canyon Drive, Las Vegas, Nevada 89128  
Telephone: (702) 538-9074 – Facsimile (702) 538-9113

**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), the undersigned, an employee of LEACH KERN GRUCHOW SONG, hereby certified that on the 11th day of August, 2025, she served a true and correct copy of the foregoing, **ANSWER TO COMPLAINT FOR DISCIPLINARY ACTION AND NOTICE OF HEARING**, by:

\_\_\_\_\_ Depositing for mailing, in a sealed envelope, U.S. postage prepaid, at Las Vegas, Nevada  
\_\_\_\_\_ Personal Delivery  
\_\_\_\_\_ Facsimile  
\_\_\_\_\_ Federal Express/Airborne Express/Other Overnight Delivery  
\_\_\_\_\_ Las Vegas Messenger Service  
  X   Electronic Service – via E-mail

addressed as follows:

Common-Interest Communities  
and Condominium Hotels  
Attn: Maria Gallo, Commission Coordinator  
3300 W. Sahara Avenue, Suite 350  
Las Vegas, NV 89102  
Email: [mgallo@red.nv.gov](mailto:mgallo@red.nv.gov)

Aaron D. Ford, Esq.  
Attorney General  
Christal P. Keegan, Esq.  
Deputy Attorney General  
5420 Kietzke Lane, Suite 202  
Reno, NV 89511  
Via Email: [ckeegan@ag.nv.gov](mailto:ckeegan@ag.nv.gov)

/s/ Bonnie L. Cibura

An employee of LEACH KERN GRUCHOW SONG