

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

3 **STATE OF NEVADA**

4 SHARATH CHANDRA, Administrator,  
5 REAL ESTATE DIVISION, DEPARTMENT  
6 OF BUSINESS & INDUSTRY, STATE OF  
7 NEVADA,

8 Petitioner,

9 vs.

10 TODD JOSLIN,

11 Respondent.

Case No. 2024-372

**FILED**

OCT 31 2024

NEVADA COMMISSION FOR  
COMMON INTEREST COMMUNITIES  
AND CONDOMINIUM HOTELS

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12 **COMPLAINT FOR DISCIPLINARY**  
13 **ACTION AND NOTICE OF HEARING**

14 The Real Estate Division of the Department of Business and Industry, State of  
15 Nevada (the "Division"), by and through its counsel, Aaron D. Ford, Attorney General of  
16 the State of Nevada, and Phil W. Su, Senior Deputy Attorney General, hereby notifies  
17 TODD JOSLIN ("RESPONDENT") of an administrative hearing before the Commission  
18 for Common-Interest Communities and Condominium Hotels, State of Nevada, which is  
19 to be held pursuant to Chapters 233B and Chapters 116 of the Nevada Revised Statutes  
20 ("NRS") and Chapter 116 of the Nevada Administrative Code ("NAC"). The purpose of  
21 the hearing is to consider the allegations stated below and to determine if an  
22 administrative penalty will be imposed on the RESPONDENTS pursuant to the  
23 provisions of NRS and NAC including, but not limited to NRS 116.785 and NRS 116.790.

24 **JURISDICTION AND NOTICE**

25 During all relevant times, RESPONDENT was an executive board  
26 member/director of a common-interest community located in Las Vegas, Nevada,  
27 Meadows Condominiums Unit Owners Association (the "Association"), and is, therefore,  
28 subject to the provisions of Chapter 116 of each the Nevada Revised Statutes ("NRS")  
and the Nevada Administrative Code ("NAC") (hereinafter collectively referred to as

1 “NRS 116”) and are subject to the jurisdiction of the Division, and the Commission for  
2 Common-Interest Communities pursuant to the provisions of NRS 116.750.

### 3 **FACTUAL ALLEGATIONS**

4 1. On April 12, 2024, the Division received an Intervention Affidavit from  
5 Complainant Joseph Gallagher regarding an allegation that RESPONDENT, while  
6 serving on the association board of directors, disclosed confidential information and  
7 referred to the Complainant, a fellow board member, as a pedophile. **CICCH001-037.**

8 2. On May 17, 2024, Division Investigator Christina Pitch sent an initial open  
9 investigation and request for information to RESPONDENT, requesting responses to  
10 allegations that he disclosed confidential information from executive sessions, and that  
11 he personally attacked other board members in letters to residents and accused another  
12 board member of being a pedophile. **CICCH038-040.**

13 3. On June 6, 2024, Attorney John Leach, representing the Association,  
14 forwarded additional emails where RESPONDENT verbally abused the Association’s  
15 CAM. **CICCH041-044.**

16 4. On June 17, 2024, Investigator Pitch requested a copy of the 4-page “door  
17 note” given by RESPONDENT to other unit owners, pertaining to the underlying towing  
18 dispute and where he personally attacked other board members, Joe Gallagher and Gail  
19 Holt. **CICCH045-046.**

20 5. Investigator Pitch subsequently received the door note, in which  
21 RESPONDENT says board member Joe Gallagher is “acting like a reckless dictator,”  
22 alleges Gallagher acted unilaterally in authorizing the tow, and alleges board member  
23 Gail Holt of “covering up for Joe.” **CICCH047-050.**

24 6. On June 11, 2024, RESPONDENT, by and through his attorney Bret  
25 Whipple, provided a response to the investigation letters and RFIs, denying allegation  
26 #1, that he had disclosed any confidential information from executive sessions, and  
27 denying allegation #2, that he accused board member Gallagher of being a pedophile,  
28 and that he simply repeated what he heard from others. **CICCH052-054.**



1 of a receiver for the Respondent.

2 The Commission may order one or any combination of the discipline described  
3 above.

4 **NOTICE OF HEARING**

5 **PLEASE TAKE NOTICE** that a disciplinary hearing has been set to consider  
6 this Administrative Complaint against the above-named RESPONDENT in accordance  
7 with Chapters 233B and 116 of the Nevada Revised Statutes and Chapter 116 of the  
8 Nevada Administrative Code.

9 **THE HEARING WILL TAKE PLACE** at the Commission meeting(s)  
10 scheduled for December 3-4, 2024, beginning at approximately 9:00 a.m. each day,  
11 or until such time as the Commission concludes its business. The Commission  
12 meeting will be held at the Nevada State Business Center, 3300 W. Sahara  
13 Avenue, 4th Floor, Nevada Room, Las Vegas, Nevada 89102 on December 3 – 4,  
14 2024,with videoconferencing to Department of Business & Industry, Division of  
15 Insurance, 1818 E. College Parkway, Suite 103, Carson City, Nevada 89706. The  
16 Commission meeting will be held at the Nevada State Business Center, 3300 W.  
17 Sahara Avenue, 4th Floor, Tahoe Room, Las Vegas, Nevada 89102 on December 5,  
18 2024, with videoconferencing to Department of Business and Industry, Division of  
19 Insurance, 1818 E. College Parkway, Suite 103, Carson City, Nevada 89706.

20  
21 **STACKED CALENDAR: Your hearing is one of several hearings that may**  
22 **be scheduled at the same time as part of a regular meeting of the Commission**  
23 **that is expected to take place on December 3-5, 2024. Thus, your hearing may**  
24 **be continued until later in the day or from day to day. It is your responsibility**  
25 **to be present when your case is called. If you are not present when your**  
26 **hearing is called, a default may be entered against you and the Commission**  
27 **may decide the case as if all allegations in the complaint were true. If you**  
28 **need to negotiate a more specific time for your hearing in advance because of**

1 coordination with an out of state witness or the like, please call Maria Gallo,  
2 Commission Coordinator, at (702) 486-4074.

3 **YOUR RIGHTS AT THE HEARING:** Except as mentioned below, the hearing is  
4 an open meeting under Nevada's open meeting law and may be attended by the public.  
5 After the evidence and arguments, the commission may conduct a closed meeting to  
6 discuss your alleged misconduct or professional competence. You are entitled to a copy of  
7 the transcript of the open and closed portions of the meeting, although you must pay for  
8 the transcription. As a RESPONDENT, you are specifically informed that you have the  
9 right to appear and be heard in your defense, either personally or through your counsel  
10 of choice. At the hearing, the Division has the burden of proving the allegations in the  
11 complaint and will call witnesses and present evidence against you. You have the right  
12 to respond and to present relevant evidence and argument on all issues involved. You  
13 have the right to call and examine witnesses, introduce exhibits, and cross-examine  
14 opposing witnesses on any matter relevant to the issues involved.

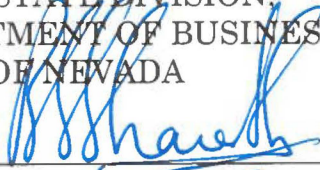
15 You have the right to request that the Commission issue subpoenas to compel  
16 witnesses to testify and/or evidence to be offered on your behalf. In making this request,  
17 you may be required to demonstrate the relevance of the witness' testimony and/or  
18 evidence. Other important rights and obligations, including your obligation to answer  
19 the complaint, you have are listed in NRS Chapter 116 and NAC Chapter 116, including  
20 without limitation, NRS 116.770 through 116.780, and NAC 116.500 through NAC  
21 116.635 and NRS Chapter 233B.

22 Note that under NAC 116.575, not less than five (5) working days before a  
23 hearing, RESPONDENT must provide to the Division a copy of all reasonably available  
24 documents that are reasonably anticipated to be used to support his position, and a list  
25 of witnesses RESPONDENT intend to call at the time of the hearing. Failure to provide  
26 any document or to list a witness may result in the document or witness being excluded  
27 from RESPONDENT'S defense. The purpose of the hearing is to determine if the  
28 RESPONDENT has violated the provisions of NRS 116, and to determine what

1 administrative penalty is to be assessed against RESPONDENT.

2 DATED this 30 day of OCTOBER, 2024.

3  
4 REAL ESTATE DIVISION,  
5 DEPARTMENT OF BUSINESS & INDUSTRY,  
6 STATE OF NEVADA

7 By:   
8 SHARATH CHANDRA, Administrator  
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10 Las Vegas, Nevada 89102  
11 (702) 486-4033

12 AARON D. FORD  
13 Attorney General

14 By: /s/ Phil W. Su  
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20 *Attorneys for Real Estate Division*