

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 AND INDUSTRY,  
7 STATE OF NEVADA,

8 Petitioner,

9 vs.

10 PIEDMONT HOMEOWNERS  
11 ASSOCIATION,  
12 (Entity Number E0134062017-0)

13 Respondent.

Case No. 2024-675

**FILED**

**DEC 23 2024**

NEVADA COMMISSION FOR  
COMMON INTEREST COMMUNITIES  
AND CONDOMINIUM HOTELS

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14 **FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER**

15 This matter came on for hearing before the Commission for Common-Interest  
16 Communities and Condominium Hotels, State of Nevada (the "Commission") during a  
17 regular agenda set on a three-day stack beginning at 9:00 a.m. on December 3, 2024 (the  
18 "Hearing"). Board member Richard Rehm and homeowner Patrick Murch appeared on  
19 behalf of Piedmont Homeowners Association ("RESPONDENT"). Christal Park Keegan,  
20 Deputy Attorney General ("DAG") with the Nevada Attorney General's Office, appeared  
21 on behalf of the Real Estate Division of the Department of Business and Industry, State  
22 of Nevada (the "Division").

23 The RESPONDENT did not contest the Division's factual allegations and violations  
24 of law in its Complaint filed October 29, 2024. The parties stipulated to admission of  
25 the Division's documents bate stamped pages NRED 000001-000035, and the  
26 RESPONDENT'S supporting documents, specifically the Annual Registration Form dated  
27 November 30, 2024 and copy of money order, to their Response filed December 2, 2024,  
28 were admitted. DAG Keegan informed the Commission that the RESPONDENT'S status  
with the Secretary of State is still in revoked status, and recommended hiring a  
community manager.

1 **FINDINGS OF FACT**

2 Based on a preponderance of the evidence in the record, the documents admitted  
3 at the Hearing, the Commission voted, to find all the following factual allegations  
4 were proven:

5 1. The Covenants, Conditions, and Restrictions (“CC&Rs”) document  
6 #20170413-0000731 recorded April 13, 2017, indicate the Piedmont Homeowners  
7 Association (“RESPONDENT”) is a common-interest community. NRED 000002,  
8 NRED 000005.

9 2. At all times relevant, the RESPONDENT Board President was  
10 Timothy Kephart, the Secretary Richard Rehm, and the Treasurer Jodi Reynolds.  
11 NRED 000011-000012.

12 3. Beginning on or about July 8, 2020, to April 6, 2022, the RESPONDENT  
13 has ignored approximately (11) mailed past due notices from the Division’s  
14 Registrations Department.

15 4. The RESPONDENT failed to submit its Form 562 Annual Association  
16 Registration Form since 2020. NRED 000002, NRED 000008, NRED 000013,  
17 NRED 000017-000018, NRED 000021-000022, and NRED 000025-000026.

18 5. Further, the RESPONDENT failed to pay the Division its required annual  
19 registration fee since about April of 2020, resulting in approximately \$150.69 in  
20 delinquent fees and interest. NRED 000002, NRED 000008, NRED 000013,  
21 NRED 000017, NRED 000021, and NRED 000025.

22 6. Therefore, on or about February 29, 2024, the Division’s Auditor informed  
23 the RESPONDENT each unit owners of its delinquency and not in good standing status.  
24 NRED 000008-000009, and NRED 000013.

25 7. The RESPONDENT’S status with the Nevada Secretary of State also  
26 indicated “Revoked.” NRED 000008, and NRED 000010.

27 8. But the Division’s Auditor did not receive even one single response from the  
28 RESPONDENT or the unit owners. NRED 000002.

1 9. Nor did the RESPONDENT ever provide the Division with any notice of  
2 termination. NRED 000002.

3 10. Furthermore, the RESPONDENT did not respond to the Division's  
4 phone calls placed on or about July 24, 2024, July 26, 2024, July 30, 2024, and/or  
5 August 12, 2024.

6 11. On or about July 26, 2024, the Division's Compliance Section sent its Second  
7 Notice for its Request for Information. NRED 000017-000019, NRED 000021-000023,  
8 and NRED 000025-000027.

9 12. None of the RESPONDENT responded to the Division's second request  
10 either. NRED 000029-000034.

11 13. Accordingly, on or about August 14, 2024, the Division informed the  
12 RESPONDENT it would commence formal disciplinary action. NRED 000029-000034.

### 13 CONCLUSIONS OF LAW

14 Based on the foregoing factual findings and the preponderance of the evidence, the  
15 Commission voted, that all the following violations of law occurred:

16 14. RESPONDENT violated NRS 116.31155(1)(a) and (3)(a) for failing to pay the  
17 required annual registration fee since April of 2020.

18 15. RESPONDENT violated NRS 116.31158(1) for failing to submit its Form 562  
19 since April of 2020.

20 16. RESPONDENT violated NAC 116.405(5)(a) by impeding or otherwise  
21 interfering with the Division's investigation by failing to respond to the Division's multiple  
22 requests to provide information or documents.

### 23 ORDER

24 The Commission, being fully apprised in the premises and good cause appearing,  
25 ORDERS as follows:

26 1. RESPONDENT shall return to the March 11-13, 2025 Commission Meeting  
27 with a status update to report its status with the Secretary of State is resolved;  
28

1           2.     RESPONDENT shall pay to the Division a total amount of Two Thousand  
2 One Hundred Thirty Four and Forty Two Cents (\$2,134.42) within six (6) months of entry  
3 of Order. This total amount reflects no administrative fine amounts for committing the  
4 above-stated violation of law, but the costs of the investigation, the attorney's fees, and  
5 the hearing.

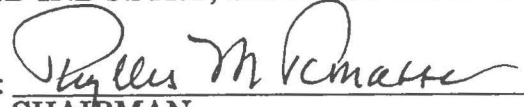
6           3.     If payment is not actually received by the Division on or before its due date,  
7 it shall be a default by RESPONDENT. In the event of default, the unpaid balance of the  
8 administrative fine and costs, together with any attorney's fees and costs that may have  
9 been assessed, shall be due in full to the Division within ten (10) calendar days of the date  
10 of default, and the Division may obtain a judgment for the amount owed, including  
11 collection fees and costs;

12           4.     RESPONDENT is on notice that if it violates any order by the Commission,  
13 the Commission may impose an administrative fine of not more than \$1,000 for each  
14 violation; and

15           5.     The Commission retains jurisdiction for correcting any errors that may have  
16 occurred in the drafting and issuance of this document.

17           DATED this 23 day of December, 2024.

18                               COMMISSION FOR COMMON-INTEREST  
19                               COMMUNITIES AND CONDOMINIUM  
20                               HOTELS, DEPARTMENT OF BUSINESS  
                                  AND INDUSTRY, STATE OF NEVADA

21                               By:   
22                               CHAIRMAN

23 Submitted by:

24 AARON D. FORD  
25 Attorney General

26 By:   
27     CHRISTAL P. KEEGAN (Bar No. 12725)  
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