

APR 14 2026

NEVADA COMMISSION FOR
COMMON INTEREST COMMUNITIES
AND CONDOMINIUM HOTELS


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From: Jean [REDACTED] >
Sent: Monday, April 13, 2026 3:32 AM
To: CICOMBUDSMAN; NRED Administration
Subject: Supplemental Public Comment Following April 10, 2026 Meeting – NRS 116 Enforcement Safeguards

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I previously submitted this comment to legislative committees and am providing it here for consideration by the Division and the Office of the Ombudsman for CICCH/HOAs. I respectfully request that it be included as supplemental public comment for the April 10, 2026 meeting.

Dear Ombudsman and Division Staff,

My name is Jean Coquilla, a Nevada resident. Thank you for your continued public service and for your attention to matters affecting homeowners across our state.

I respectfully submit this as supplemental public comment following the April 10, 2026 meeting regarding proposed changes and ongoing discussions related to NRS 116, particularly those involving enforcement procedures, fine structures, and "health, safety, or welfare" (HSW) designations.

As discussed in prior meetings, Nevada has approximately 3,900 HOA communities and over 623,000 housing units governed by HOAs. Between 2020 and 2025, approximately 29,000 Notices of Default were recorded in Clark County alone. These figures underscore the scale at which enforcement actions can directly impact Nevada homeowners.

Additionally, Nevada is home to approximately 55,000 individuals living with Alzheimer's disease, according to the Alzheimer's Association. Per the U.S. Department of Veterans Affairs and Nevada state reports, approximately 219,000 veterans live in Nevada. Many of these individuals reside within HOA-governed communities, further highlighting the importance of clear, fair, and reliable enforcement processes.

While efforts to strengthen enforcement authority and address legitimate violations are understood, there remains a critical procedural gap that places homeowners—particularly seniors, veterans, and individuals experiencing cognitive or health-related challenges—at significant risk.

Primary Concern: Lack of Required Acknowledgment Before Escalation

Current law does not require documented acknowledgment of payment, compliance, or resolution before an HOA escalates enforcement actions, including the issuance of a Notice of Default—particularly concerning in a non-judicial foreclosure state such as Nevada.

Without verification, enforcement can create unintended harm. Simple acknowledgment and review safeguards help ensure penalties are applied accurately and fairly.

This gap creates the potential for:

- * Escalation despite attempted or completed compliance
- * Misapplied penalties due to administrative or communication errors
- * Disproportionate consequences for vulnerable populations

In one documented instance, an 89-year-old veteran in Clark County lost a home after submitting payments to his HOA, illustrating how breakdowns in communication and verification can result in irreversible outcomes. The same individual also received a \$10,000 penalty on another property for a maintenance issue that had already been corrected.

Recommendation: Procedural Safeguard Requirement

I respectfully propose that NRS 116 be strengthened to require:

1. Mandatory written acknowledgment of payment or compliance by the HOA prior to any escalation of enforcement action
2. A defined verification period to confirm receipt and processing of homeowner submissions
3. Documentation standards ensuring that homeowners are clearly notified of their status before penalties or default actions proceed

This safeguard would not weaken enforcement. Rather, it would ensure that enforcement actions are accurate, transparent, and just.

Additional Consideration: HSW Classification and Fine Expansion

As discussions continue regarding the expansion of HSW definitions and potential increases in fines, it is especially important that procedural protections be in place. Without these safeguards, increased penalties may amplify the consequences of administrative error or miscommunication.

Closing

Nevada has the opportunity to lead in balancing enforcement authority with homeowner protections. Several states, including California, Florida, Texas, Colorado, Utah, Maryland, Washington, and North Carolina, have taken steps to improve transparency and procedural fairness in HOA enforcement. Nevada can build upon these efforts with targeted, practical reforms.

Thank you again for your time and consideration. I would be grateful for the opportunity to provide any additional input or clarification as these discussions continue.

Respectfully submitted,
Jean Coquilla
Nevada Resident

