

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 SANTA BARBARA VILLAGE
11 HOMEOWNERS ASSOCIATION, (Entity No.
12 C6798-1983),

13 Respondent.

Case No. 2025-653

FILED

MAY 08 2026

NEVADA COMMISSION FOR
COMMON INTEREST COMMUNITIES
AND CONDOMINIUM HOTELS

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14 **COMPLAINT FOR DISCIPLINARY**
15 **ACTION AND NOTICE OF HEARING**

16 The Real Estate Division of the Department of Business and Industry, State of
17 Nevada (the "Division"), by and through its counsel, Aaron D. Ford, Attorney General of
18 the State of Nevada, and William C. Peper, Deputy Attorney General, hereby notifies
19 RESPONDENT SANTA BARBARA VILLAGE HOMEOWNERS ASSOCIATION,
20 ("RESPONDENT ASSOCIATION" or "RESPONDENT"), of an administrative hearing
21 before the Commission for Common-Interest Communities and Condominium Hotels,
22 State of Nevada, which is to be held pursuant to Chapter 233B and 116 of the Nevada
23 Revised Statutes ("NRS") and Chapter 116 of the Nevada Administrative Code ("NAC").
24 The purpose of the hearing is to consider the allegations stated below and to determine if
25 an administrative penalty will be imposed on the RESPONDENT ASSOCIATION
26 pursuant to the provisions of NRS and NAC including but not limited to NRS 116.785 and
27 NRS 116.790.

28 **JURISDICTION AND NOTICE**

At all times relevant to this Complaint, RESPONDENT SANTA BARBARA
VILLAGE HOMEOWNERS ASSOCIATION, Entity Number C6798-1983, has been a

1 common-interest community located in North Las Vegas, Nevada. RESPONDENT
2 ASSOCIATION is subject to the provisions of Chapter 116 of both the Nevada Revised
3 Statutes (“NRS”) and the Nevada Administrative Code (“NAC”) (hereinafter collectively
4 referred to as “NRS 116”), pursuant to the provisions of NRS 116.750.

5 FACTUAL ALLEGATIONS

6 1. RESPONDENT ASSOCIATION, Entity Number C6798-1983, consists of
7 forty (40) condominium units in a common interest community located in North Las Vegas,
8 Nevada. **CICCH001-002.**

9 2. On August 19, 2025, Robert E. Sult, a unit owner within RESPONDENT
10 ASSOCIATION, filed an Intervention Affidavit (“Affidavit”) with the Division.
11 **CICCH003-048.**

12 3. The Affidavit set forth several allegations, including an allegation
13 RESPONDENT ASSOCIATION had failed to maintain its corporate registration with the
14 State of Nevada, and that RESPONDENT ASSOCIATION was, as to damage to unit
15 owners’ roofs, which consisted of common elements, improperly requiring those unit
16 owners to negotiate and pay for damage to roofs and other common elements before
17 obtaining, if at all, possible future reimbursement. **CICCH003-048.**

18 4. The Affidavit also set forth other allegations either not relevant to the
19 Division’s alleged statutory violations here or otherwise resolved before the time of the
20 filing of this Complaint. **CICCH003-048.**

21 5. From a check of records with the Nevada Secretary of State, the
22 RESPONDENT ASSOCIATION has recently corrected the violation concerning the
23 revoked corporate status of the RESPONDENT ASSOCIATION, also referenced in an
24 email to the Division on January 29, 2026, and therefore, this issue is now deemed
25 satisfactorily resolved for purposes of the Division’s alleged statutory violations against
26 RESPONDENT ASSOCIATION. **CICCH049-055; CICCH066-070.**

27 6. On behalf of the Division, Kathryn Null requested responsive information as
28 to the Complainant’s allegations and received a response on October 16, 2025, from the

1 CAM, Leah Wickline of Varalino Community Management, who noted that the association
2 had been revoked with the Nevada Secretary of State's office, but that a recent application
3 for reinstatement had been rejected. **CICCH056-059.**

4 7. On November 18, 2025, the Division sent a letter requesting information to
5 CAM Wickline and to the two named board members, Janet Cook-Denman and
6 Christopher Covington, seeking documents and other responses to unresolved issues
7 indicating violations of the Nevada Revised Statutes, Chapter 116. **CICCH060-062.**

8 8. On November 26, 2025, CAM Leah Wickline responded to further questions
9 from Investigator Towle regarding who was responsible for roof leak repairs, and the
10 status and number of affected units; none of the responses acknowledged that the
11 Association bore responsibility for repairs of the common elements. CAM Wickline also
12 noted that the re-registration was in process, despite the November rejection. **CICCH063-**
13 **065.**

14 9. On January 14, 2026, CAM Wickline provided further comments in response
15 to investigator questions regarding how many units were damaged; how many were
16 repaired and reimbursed, and what authority did the Association use to base their decision
17 to transfer the duty of repair onto individual unit owners. CAM Wickline did not dispute
18 that the individual owners were left to make their own repairs and had to seek subsequent
19 reimbursement. **CICCH066-070.**

20 10. On January 26, 2026, The Division sent to RESPONDENT ASSOCIATION,
21 care of CAM Wickline and Varalino Community Management, an NRS 233B letter, via
22 Certified Mail, notifying the RESPONDENT ASSOCIATION that the Division had
23 obtained sufficient evidence, referencing alleged violations of NRS 116.3103(1), and NRS
24 116.3107(1), to commence disciplinary action by filing a complaint as a result of its
25 investigations. **CICCH071-072.**

26 **VIOLATIONS OF LAW**

27 1. **RESPONDENT ASSOCIATION** violated NRS 116.3107 by failing to provide
28 for the maintenance, repair and replacement of common elements in connection with

1 recent roofing and related damage affecting at least thirteen units within the
2 RESPONDENT ASSOCIATION.

3 DISCIPLINE AUTHORIZED

4 Pursuant to the provisions of NRS 116.615; NRS 116.755; NRS 116.785; and NRS
5 116.790, the Commission has discretion to take any or all of the following actions:

- 6 1. Issue an order directing RESPONDENT ASSOCIATION to take affirmative action
7 to correct any conditions resulting from the violations.
- 8 2. Impose an administrative fine of up to \$1,000 for each violation by RESPONDENT
9 ASSOCIATION.
- 10 3. Order the RESPONDENT ASSOCIATION to pay the costs of the proceedings
11 incurred by the Division, including, without limitation, the cost of the investigation
12 and reasonable attorney's fees.
- 13 4. Approve, if warranted, the application to a court of competent jurisdiction for the
14 appointment of a receiver for the RESPONDENT ASSOCIATION.

15 The Commission may order one or any combination of the discipline described
16 above.

17 NOTICE OF HEARING

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

22 **THE HEARING WILL TAKE PLACE** at the Commission meeting(s) scheduled
23 for June 9 - 11, 2026, beginning at approximately 9:00 a.m. each day, or until such time
24 as the Commission concludes its business. The Commission meeting will be held at the
25 Nevada State Business Center, 3300 W. Sahara Avenue, 4th Floor, Nevada Room, Las
26 Vegas, Nevada 89102, with videoconferencing to Department of Business & Industry,
27 Division of Insurance, 1818 College Parkway, Suite 103, Carson City, Nevada 89706.

28 **STACKED CALENDAR: Your hearing is one of several hearings that may**

1 be scheduled at the same time as part of a regular meeting of the Commission
2 that is expected to take place on June 9 - 11, 2026. Thus, your hearing may be
3 continued until later in the day or from day to day. It is your responsibility to
4 be present when your case is called. If you are not present when your hearing
5 is called, a default may be entered against you, and the Commission may decide
6 the case as if all allegations in the complaint were true. If you need to negotiate
7 a more specific time for your hearing in advance because of coordination with
8 an out-of-state witness or the like, please call Maria Gallo, Commission
9 Coordinator, at (702) 486-4074.

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

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

1 Note that under NAC 116.575, not less than five (5) working days before a hearing,
2 RESPONDENT ASSOCIATION must provide the Division with a copy of all reasonably
3 available documents that are reasonably anticipated to be used to support your position,
4 and a list of witnesses RESPONDENT ASSOCIATION intends to call at the time of the
5 hearing. Failure to provide any document or to list a witness may result in the document
6 or witness being excluded from RESPONDENT ASSOCIATION's defense.

7 The purpose of the hearing is to determine if the RESPONDENT ASSOCIATION
8 has violated the provisions of NRS 116, and to determine what administrative penalty is
9 to be assessed against RESPONDENT ASSOCIATION.

10 DATED this 7th day of May, 2026.

11
12 REAL ESTATE DIVISION,
13 DEPARTMENT OF BUSINESS & INDUSTRY,
14 STATE OF NEVADA

15 By: 

16 SHARATH CHANDRA, Administrator
17 3300 W. Sahara Ave. Ste 350
18 Las Vegas, Nevada 89102
(702) 486-4033

19 AARON D. FORD
20 Attorney General

21
22 By: /s/ William C. Peper

23 WILLIAM C. PEPER (Bar No. 16741)
24 Deputy Attorney General
25 1 State of Nevada Way, Ste. 100
26 Las Vegas, Nevada 89119
27 (702) 486-3420
28 *Attorneys for Real Estate Division*