

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 ROBINDALE/TAMARUS HOMEOWNER'S  
11 ASSOCIATION, (Entity No. C12712-2001),

12 Respondent.

Case No. 2025-612

**FILED**

FEB 06 2026

NEVADA COMMISSION FOR  
COMMON INTEREST COMMUNITIES  
AND CONDOMINIUM HOTELS

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

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

27 **JURISDICTION AND NOTICE**

28 At all times relevant to this Complaint, RESPONDENT ROBINDALE/TAMARUS  
HOMEOWNER'S ASSOCIATION, Entity Number C12712-2001, a common-interest  
community located in Las Vegas, Nevada. RESPONDENT ASSOCIATION and is subject

1 to the provisions of Chapter 116 of each the Nevada Revised Statutes (“NRS”) and the  
2 Nevada Administrative Code (“NAC”) (hereinafter collectively referred to as “NRS 116”),  
3 pursuant to the provisions of NRS 116.750.

4 **FACTUAL ALLEGATIONS**

5 1. RESPONDENT ASSOCIATION, Entity Number C12712-2001, consists of  
6 seven (7) single family home units in a common interest community located in Las Vegas,  
7 Nevada. **CICCH0001-0004.**

8 2. On May 13, 2025, RESPONDENT ASSOCIATION filed a registration filing  
9 addendum naming Mike Hillyard as Board President and Scott Kieper as Board Secretary.  
10 **CICCH0003-0004.**

11 3. Mike Hillyard was elected or otherwise appointed to a position on the Board  
12 of Directors for RESPONDENT ASSOCIATION and, on information and belief, as of the  
13 date of this Complaint’s filing, continues to hold that position. **CICCH0003-0004.**

14 4. Scott Kieper was elected or otherwise appointed to a position on the Board of  
15 Directors for RESPONDENT ASSOCIATION and, on information and belief, as of the date  
16 of this Complaint’s filing, continues to hold that position. **CICCH0003-0004.**

17 5. Outside of Mike Hillyard and Scott Kieper, the RESPONDENT  
18 ASSOCIATION has no other current board members. **CICCH0003-0004.**

19 6. On August 12, 2025, the Division’s Office of the Ombudsman received an  
20 Intervention Affidavit filed by Complainant, unit owner, and former board member Jacobo  
21 Chavez alleging that RESPONDENT ASSOCIATION had committed various violations of  
22 NRS 116, including that they had not held any board meetings in the last five years, did  
23 not inform unit owners of the association’s financial status, did not collect HOA dues from  
24 all unit owners, and failed to maintain common elements of the association. **CICCH0005-  
25 0008.**

26 7. On August 19, 2025, the Division issued letters by certified mail, addressed  
27 to the record owners of each of the seven (7) lots within the RESPONDENT  
28 ASSOCIATION, as exemplified by copies sent to Complainant Chavez and to unit owners

1 Richard and Jean Rayner (collectively, the “Notice Letters”), based on ownership records  
2 as shown by the then-current Clark County Real Estate records. **CICCH0012-0014.**

3 8. The owner of 7728 Maggie Belle Court, the Complainant, acknowledged  
4 receipt of the Notice Letter. **CICCH0014.**

5 9. The owners of 7725 Maggie Belle Court received the Notice Letter on  
6 September 5, 2025; no response was made to the Division. **CICCH0014.**

7 10. The owners of 7735 Maggie Belle Court received the Notice Letter on  
8 September 5, 2025; no response was made to the Division. **CICCH0014.**

9 11. The owners of 7738 Maggie Belle Court received the Notice Letter on August  
10 23, 2025; no response has been made to the Division. **CICCH0014.**

11 12. The Notice Letter addressed to 7745 Maggie Belle Court was returned by the  
12 postal service with the notation that the address was “Vacant, Unable to Forward.”  
13 **CICCH0014.**

14 13. The Notice Letter addressed to 7748 Maggie Belle Court was noted by the  
15 postal service as “Moving Through Network.” The record owner is shown in the Clark  
16 County Assessor’s Office as Easy Exit Home Solutions LLC with a registered address of  
17 4030 Wake Forest Road, Raleigh, NC 27809. **CICCH0014.**

18 14. The owners of 7755 Maggie Belle Court received the Notice Letter on  
19 September 5, 2025. **CICCH0014.**

20 15. On September 11, 2025, Kathryn Null, Ombudsman’s office program officer,  
21 referred the matter to the Compliance Section for further review and investigation of  
22 apparent violations of NRS 116. **CICCH0015-0018.**

23 16. On October 27, 2025, after further investigation, the Division sent  
24 RESPONDENT ASSOCIATION an NRS 233B letter notifying the RESPONDENT  
25 ASSOCIATION that the Division has obtained sufficient evidence, referencing alleged  
26 violations of NRS 116.31034(1), NRS 116.31083(1), NRS 116.3115 and NRS 116.3107(1)  
27 and NRS 116.31152 to commence disciplinary action by filing a complaint as a result of its  
28 investigation. **CICCH0019-0023.**

1 **VIOLATIONS OF LAW**

2 1. RESPONDENT ASSOCIATION violated NRS 116.31034(1) by failing to  
3 maintain at least three board members.

4 2. RESPONDENT ASSOCIATION violated NRS 116.31083(1) by failing to hold  
5 board meetings at least once each quarter.

6 3. RESPONDENT ASSOCIATION violated NRS 116.3115 by failing to assess  
7 dues against all units.

8 4. RESPONDENT ASSOCIATION violated NRS 116.3107(1) by failing to  
9 provide for the necessary maintenance and repair of common elements.

10 **DISCIPLINE AUTHORIZED**

11 Pursuant to the provisions of NRS 116.615; NRS 116.755; NRS 116.785; and NRS  
12 116.790, the Commission has discretion to take any or all of the following actions:

13 1. Issue an order directing RESPONDENT ASSOCIATION to take affirmative  
14 action to correct any conditions resulting from the violations.

15 2. Impose an administrative fine of up to \$1,000 for each violation by  
16 RESPONDENT ASSOCIATION.

17 3. Order the RESPONDENT ASSOCIATION to pay the costs of the proceedings  
18 incurred by the Division, including, without limitation, the cost of the investigation and  
19 reasonable attorney's fees.

20 4. Approve, if warranted, the application to a court of competent jurisdiction for  
21 the appointment of a receiver for the RESPONDENT ASSOCIATION.

22 The Commission may order one or any combination of the discipline described  
23 above.

24 **NOTICE OF HEARING**

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

1           **THE HEARING WILL TAKE PLACE** at the Commission meeting(s) scheduled  
2 for March 10-12, 2026, beginning at approximately 9:00 a.m. each day, or until such time  
3 as the Commission concludes its business. The Commission meeting will be held at the  
4 Nevada State Business Center, 3300 W. Sahara Avenue, 4th Floor, Nevada Room, Las  
5 Vegas, Nevada 89102, with videoconferencing to Department of Business & Industry,  
6 Division of Insurance, 1818 College Parkway, Suite 103, Carson City, Nevada 89706.

7           **STACKED CALENDAR: Your hearing is one of several hearings that may**  
8 **be scheduled at the same time as part of a regular meeting of the Commission**  
9 **that is expected to take place on March 10-12, 2026. Thus, your hearing may be**  
10 **continued until later in the day or from day to day. It is your responsibility to**  
11 **be present when your case is called. If you are not present when your hearing**  
12 **is called, a default may be entered against you and the Commission may decide**  
13 **the case as if all allegations in the complaint were true. If you need to negotiate**  
14 **a more specific time for your hearing in advance because of coordination with**  
15 **an out-of-state witness or the like, please call Maria Gallo, Commission**  
16 **Coordinator, at (702) 486-4074.**

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

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

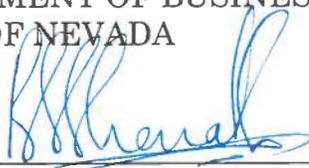
8           Note that under NAC 116.575, not less than five (5) working days before a hearing,  
9 RESPONDENT ASSOCIATION must provide to the Division a copy of all reasonably  
10 available documents that are reasonably anticipated to be used to support your position,  
11 and a list of witnesses RESPONDENT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

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

4  
5 DATED this 6th day of February, 2026.

6 REAL ESTATE DIVISION,  
7 DEPARTMENT OF BUSINESS & INDUSTRY,  
8 STATE OF NEVADA

9 By:   
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12 Las Vegas, Nevada 89102  
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14 AARON D. FORD  
15 Attorney General

16 By: /s/ *William C. Peper*  
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