

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 OF
6 BUSINESS & INDUSTRY, STATE OF
7 NEVADA,

8 Petitioner,

9 vs.

10 BRADFORD PLACE COMMUNITY
11 ASSOCIATION INC.
12 (Entity Number C400-1972),
13 JANICE ARMSTEAD, CARMEN FUENTES,
14 and STEPHANY MARRON,

15 Respondents.

Case No. 2026-366

FILED

AUG 07 2026

NEVADA COMMISSION FOR
COMMON INTEREST COMMUNITIES
AND CONDOMINIUM HOTELS

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16 **COMPLAINT FOR DISCIPLINARY**
17 **ACTION AND NOTICE OF HEARING**

18 The Real Estate Division of the Department of Business and Industry, State of
19 Nevada (the "Division"), by and through its counsel, Aaron D. Ford, Attorney General
20 of the State of Nevada, and Phil W. Su, Senior Deputy Attorney General, hereby
21 notifies Bradford Place Community Association ("RESPONDENT ASSOCIATION")
22 and association board members Janice Armstead, Carmen Fuentes, and Stephany
23 Marron ("RESPONDENT BOARD MEMBERS") (collectively, the "RESPONDENTS")
24 of an administrative hearing before the Commission for Common-Interest
25 Communities and Condominium Hotels, State of Nevada, which is to be held
26 pursuant to Chapters 233B and Chapters 116 of the Nevada Revised Statutes ("NRS")
27 and Chapter 116 of the Nevada Administrative Code ("NAC"). The purpose of the
28 hearing is to consider the allegations stated below and to determine if an
administrative penalty will be imposed on the RESPONDENT pursuant to the
provisions of NRS and NAC including but not limited to NRS 116.785 and NRS
116.790.

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JURISDICTION AND NOTICE

During all relevant times, RESPONDENT ASSOCIATION is a common-interest community located in Las Vegas, Nevada (Entity Number C400-1972) whose executive board presently consists of the named RESPONDENT BOARD MEMBERS, Janice Armstead, Carmen Fuentes, and Stephany Marron. Thus, RESPONDENT ASSOCIATION and the RESPONDENT BOARD MEMBERS are subject to the provisions of Chapter 116 of the Nevada Revised Statutes ("NRS") and the Nevada Administrative Code ("NAC") and are subject to the jurisdiction of the Division and the Commission for Common Interest Communities pursuant to the provisions of NRS 116.750.

FACTUAL ALLEGATIONS

1. RESPONDENT ASSOCIATION is a common-interest community located in Las Vegas, Nevada (Entity Number C400-1972) with 171 units. CICCH0015-0016.

2. As of the date of filing of this Complaint, RESPONDENT ASSOCIATION is presently governed by RESPONDENT BOARD MEMBERS Janice Armstead, Carmen Fuentes, and Stephany Marron. CICCH0016.

3. At all times relevant to this Complaint, RESPONDENT ASSOCIATION has been managed by several community association managers, including Heritage Association Management Group from April 1, 2022, through April 31, 2023; Griswold Real Estate Management Company from May 1, 2023, through January 31, 2025; and Level Management beginning February 1, 2025. CICCH0012-0013.

4. On April 24, 2026, the Division opened an investigation against RESPONDENTS and issued a Request for Information ("RFI") letter via certified mail to the RESPONDENTS, noting allegations that RESPONDENT ASSOCIATION failed to establish adequate reserves, owed past-due amounts to the Division for per-unit "door fees", and failed to provide for the maintenance, repair and/or replacement of common elements. The RFI requested response within ten (10) business days of

1 the letter. CICCH0005-0007.

2 5. On May 5, 2026, the Division received a response to the RFI with the
3 requested documents. CICCH0075-0133.

4 6. RESPONDENTS' response included a copy of their 2023 reserve study,
5 proof of payment of late "door fees," and an email concerning a 2021 draft audit.
6 CICCH0075-0133.

7 7. RESPONDENTS also provided copies of their budgets, interim financial
8 statements, meeting minutes, and tax documentation from June 2023 through March
9 2026. CICCH0146-2198 (Vol. II).

10 8. RESPONDENTS response noted that the Association lacked funds due
11 to an increase in master policy insurance of 332%, two fires that occurred in 2024 and
12 2025 with \$25,000.00 deductibles each, and negative impacts from the performance
13 of their selected community management companies. CICCH0076-0079.

14 9. The September 21, 2023, reserve study recommended a fully funded
15 plan of \$9,918 per month (\$58 per unit) and a twenty percent threshold plan of \$7,866
16 per month (\$46 per unit). CICCH0089-0134.

17 10. On November 25, 2025, RESPONDENT notified its homeowners of a
18 \$33.50 per month special reserve assessment, which estimated to grow the reserve
19 budget to \$113,667, approximately sixteen percent (16%) of the fully funded balance.
20 CICCH0049.

21 11. The financial statements provided showed that as of December 31, 2025,
22 RESPONDENTS had \$12,058 in their reserve budget, which required \$600,595 to be
23 fully funded. CICCH0010-0048.

24 12. Interim financial statements for 2026 project estimated that
25 RESPONDENTS would have \$113,667 in their reserve account which, if fully funded,
26 required a reserve budget of \$722,802. CICCH0049-0061.

27 13. On April 23, 2026, the Division's Investigator, Daniel Messer, visited the
28 property and captured images of signs of disrepair. Multiple areas contained dead

1 grass, standing water was pooled, and dried sewage was found on the sidewalks after
2 a plumbing issue. CICCH0063-0069.

3 14. An email dated 05/21/2026 from board member Janice Armstrong to
4 Valerie Leaks of Level Community Management noted the water supply for
5 landscaping was discontinued in 2018 and 2019 and would cost \$3,900 to resume the
6 landscaping water supply. CICCH0069.

7 15. The investigation determined that for the fiscal years of 2023, 2024, and
8 2025, RESPONDENTS had a total annual budget assessment of \$246,240.00,
9 \$287,280.00, and \$361,152.00, respectively. CICCH0070-0075.

10 16. On May 11, 2026, and the Division sent a second RFI, noting allegations
11 that RESPONDENT ASSOCIATION failed to have its financial records audited by
12 an independent CPA from 2023 through 2025, failed to have its year-end financial
13 statements prepared by an independent CPA for fiscal years 2023 and 2024, and
14 failed to establish a funding plan pursuant to NRS 116.3115(2)(b). The RFI requested
15 response within five (5) business days of the letter. CICCH0008-0009.

16 17. On May 15, 2026, the Division received a response to the second RFI,
17 including a timeline in RESPONDENT ASSOCIATION'S hiring of Heritage
18 Management Group. CICCH0135-0142.

19 18. On May 28, 2026, the Division notified RESPONDENTS in an NRS
20 233B letter sent via certified mail that it had obtained sufficient information to
21 commence disciplinary action and would file a complaint with the Commission
22 alleging violations of NRS 116.3115(2)(b), NRS 116.31155(4), NRS 116.3107(1), NRS
23 116.31144(1) and NAC 116.457(1). CICCH 0143-0145.

24 VIOLATIONS OF LAW

25 1. RESPONDENTS violated NRS 116.3115(2)(b) pursuant to NAC
26 116.415(2) by failing to maintain an adequate reserve budget for the repair,
27 replacement, and restoration of major components of the common elements and any
28 portion of the common-interest community.

2. RESPONDENTS violated NRS 116.3115(2)(b) pursuant to NAC 116.425(1)(m) by failing to maintain an actuarially designed funding plan that allocates the cost of maintenance, repair, replacement and restoration of the major components of common elements and methods used in projecting the 30-year funding plan.

3. RESPONDENTS violated NRS 116.31155 by failing to timely remit payment of an administrative penalty assessed by the Division pertaining to per-unit "door fees" against RESPONDENT ASSOCIATION.

4. RESPONDENTS violated NRS 116.3107 by failing to maintain, repair and replace the common elements of the property.

5. RESPONDENTS violated NRS 116.3144(1) pursuant to NAC 116.457(1) on three (3) separate occasions by failing to have RESPONDENT ASSOCIATION'S financial statements audited or reviewed by an independent CPA for fiscal years 2023, 2024 and 2025.

DISCIPLINE AUTHORIZED

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

1. Issue an order directing Respondent to take affirmative action to correct any conditions resulting from the violation.

2. Impose an administrative fine of up to \$1,000 for each violation by Respondent.

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

4. Approve application to a court of competent jurisdiction for the appointment of a receiver for the Respondent.

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

1 **NOTICE OF HEARING**

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

6 **THE HEARING WILL TAKE PLACE** at the Commission meeting(s) scheduled
7 for September 8-10, 2026, beginning at approximately 9:00 a.m. each day, or until such
8 time as the Commission concludes its business. The Commission meeting will be held at
9 the Nevada State Business Center, 3300 W. Sahara Avenue, 4th Floor, Nevada Room, Las
10 Vegas, Nevada 89102 on September 8-10, 2026, with videoconferencing to Department of
11 Business & Industry, Division of Insurance, 1818 E. College Parkway, Suite 103, Carson
12 City, Nevada 89706.

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

23 **YOUR RIGHTS AT THE HEARING:** Except as mentioned below, the hearing is
24 an open meeting under Nevada's open meeting law and may be attended by the public.
25 After the evidence and arguments, the commission may conduct a closed meeting to
26 discuss your alleged misconduct or professional competence. You are entitled to a copy of
27 the transcript of the open and closed portions of the meeting, although you must pay for
28 the transcription. As a RESPONDENT, you are specifically informed that you have the

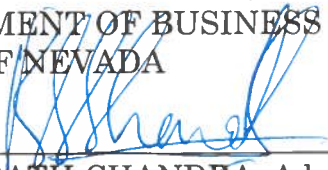
1 right to appear and be heard in your defense, either personally or through your counsel of
2 choice. At the hearing, the Division has the burden of proving the allegations in the
3 complaint and will call witnesses and present evidence against you. You have the right to
4 respond and to present relevant evidence and argument on all issues involved. You have
5 the right to call and examine witnesses, introduce exhibits, and cross-examine opposing
6 witnesses on any matter relevant to the issues involved.

7 You have the right to request that the Commission issue subpoenas to compel
8 witnesses to testify and/or evidence to be offered on your behalf. In making this request,
9 you may be required to demonstrate the relevance of the witness' testimony and/or
10 evidence. Other important rights and obligations, including your obligation to answer the
11 complaint, you have are listed in NRS Chapter 116 and NAC Chapter 116, including
12 without limitation, NRS 116.770 through 116.780, and NAC 116.500 through NAC
13 116.635 and NRS Chapter 233B.

14 Note that under NAC 116.575, not less than five (5) working days before a hearing,
15 RESPONDENT must provide to the Division a copy of all reasonably available documents
16 that are reasonably anticipated to be used to support his position, and a list of witnesses
17 RESPONDENT intend to call at the time of the hearing. Failure to provide any document
18 or to list a witness may result in the document or witness being excluded from
19 RESPONDENT'S defense. The purpose of the hearing is to determine if the
20 RESPONDENT has violated the provisions of NRS 116, and to determine what
21 administrative penalty is to be assessed against RESPONDENT.

22 DATED this 6 day of Aug, 2026.
23

24 REAL ESTATE DIVISION,
25 DEPARTMENT OF BUSINESS & INDUSTRY,
26 STATE OF NEVADA

27 By: 
28 SHARATH CHANDRA, Administrator
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By: /s/ Phil W. Su

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