

**From:** [Paul De La Cruz](#)  
**To:** [Community Insights E-Subscribers](#)  
**Cc:** [Shareece N. Bates](#)  
**Subject:** Re: CICCH/HOA Task Force Meeting - April 14, 2026  
**Date:** Monday, April 13, 2026 8:41:10 AM

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CICCH/HOA Task Force – April 14, 2026 Agenda Items 4.A.1–4.A.5

Thank you for the opportunity to provide comment. After reviewing the proposed statutory revisions, I respectfully submit that the changes primarily expand board and management discretion while offering minimal substantive benefit to homeowners, who are the regulated public these statutes are intended to protect.

1. Board Action Without a Meeting (NRS 116.31083)

The proposal broadens the circumstances under which boards may act outside a noticed meeting and relies on after-the-fact ratification.

This reduces transparency and increases the risk of non-public decision-making without adding:

- notice requirements,
- limits on what actions may be taken outside a meeting, or
- safeguards against misuse of “urgent” classifications.

The revisions benefit boards operationally but do not strengthen homeowner rights.

2. Capital Improvement Definitions (NRS 116.3115)

The proposed definitions narrow what qualifies as a capital improvement and broaden what may be treated as routine maintenance.

This reduces notice obligations and opportunities for owner input on significant expenditures.

The revisions do not address:

- owner voting rights,
- reserve-fund transparency, or
- protections against reclassifying major projects to avoid notice requirements.

3. Complaint Placement on Agenda (NRS 116.31087)

While acknowledgment and response timelines are helpful, the proposal:

- allows boards to avoid public discussion,
- permits undefined “good cause” extensions, and
- provides no enforcement mechanism if a board fails to respond.

The anti-retaliation language duplicates existing statute and does not create new remedies.

The result is procedural improvement without meaningful accountability.

4. Sanctions and Common-Element Restrictions (NRS 116.31031)

The revisions expand sanction duration and scope but do not add:

- due-process protections,
- evidentiary standards,
- appeal rights, or
- judicial review.

Increasing punitive authority without corresponding safeguards risks disproportionate or inconsistent enforcement.

#### 5. ADR Procedures (NRS 38.300–360)

The proposed changes increase mediation timelines, costs, and procedural complexity.

This makes dispute resolution more burdensome for homeowners and does not address:

- accessibility,
- affordability,
- plain-language guidance, or
- the structural imbalance between homeowners and associations.

#### Overall Assessment

Across all five items, the proposed revisions:

- expand board and management authority,
- increase sanction tools,
- increase procedural hurdles for homeowners, and
- do not address long-standing structural oversight gaps.

They do not strengthen transparency, accountability, due process, access to records, management-company regulation, or constitutional safeguards.

#### Recommendation

I respectfully request that the Task Force evaluate whether these revisions align with the Legislature’s intent to protect homeowners and consider incorporating homeowner-centric reforms, including:

- proactive oversight mechanisms,
- management-company accountability,
- clearer statutory interpretation guidance,
- due-process protections for sanctions, and
- accessible, affordable dispute-resolution pathways.

Thank you for your consideration. Paul DeLaCruz

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**From:** Community Insights E-Subscribers <COMMUNITYINSIGHTS@LISTSERV.STATE.NV.US> on behalf of Shareece N. Bates <00000369c10b8286-dmarc-request@LISTSERV.STATE.NV.US>

**Sent:** Friday, April 10, 2026 10:21 AM

**To:** COMMUNITYINSIGHTS@LISTSERV.STATE.NV.US  
<COMMUNITYINSIGHTS@LISTSERV.STATE.NV.US>

**Subject:** CICCH/HOA Task Force Meeting - April 14, 2026

Good morning,

On Wednesday, the Division posted notice of the upcoming CICCH/HOA Task Force meeting scheduled for Tuesday, April 14, 2026.

The agenda and supporting meeting documents can be found on the Division's website here: [https://red.nv.gov/Content/Meetings/Task\\_Force/2026/April/](https://red.nv.gov/Content/Meetings/Task_Force/2026/April/)

Have a great day

Shareece

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