BEFORE THE COMMISSION FOR COMMON-INTEREST COMMUNITIES AND CONDOMINIUM HOTELS

STATE OF NEVADA

SHARATH CHANDRA, Administrator, REAL ESTATE DIVISION, DEPARTMENT OF BUSINESS & INDUSTRY, STATE OF NEVADA, Petitioner, vs. LAS VEGAS MOTORCOACH RESORT OWNERS ASSOCIATION, (Entity No. C2830-2001), Respondent.	Case No. 2024-454

FILED

MAY 08 2026

NEVADA COMMISSION FOR COMMON INTEREST COMMUNITIES AND CONDOMINIUM HOTELS

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COMPLAINT FOR DISCIPLINARY ACTION AND NOTICE OF HEARING

The Real Estate Division of the Department of Business and Industry, State of Nevada (the "Division"), by and through its counsel, Aaron D. Ford, Attorney General of the State of Nevada, and William C. Peper, Deputy Attorney General, hereby notifies RESPONDENT LAS VEGAS MOTORCOACH RESORT OWNERS ASSOCIATION, ("RESPONDENT ASSOCIATION" or "RESPONDENT"), of an administrative hearing before the Commission for Common-Interest Communities and Condominium Hotels, State of Nevada, which is to be held pursuant to Chapter 233B and 116 of the Nevada Revised Statutes ("NRS") and Chapter 116 of the Nevada Administrative Code ("NAC"). The purpose of the hearing is to consider the allegations stated below and to determine if an administrative penalty will be imposed on the RESPONDENT ASSOCIATION pursuant to the provisions of NRS and NAC including but not limited to NRS 116.785 and NRS 116.790.

JURISDICTION AND NOTICE

At all times relevant to this Complaint, RESPONDENT LAS VEGAS MOTORCOACH RESORT OWNERS ASSOCIATION, Entity Number C2830-2001, has

been a common-interest community located in Las Vegas, Nevada. RESPONDENT ASSOCIATION is subject to the provisions of Chapter 116 of both the Nevada Revised Statutes ("NRS") and the Nevada Administrative Code ("NAC") (hereinafter collectively referred to as "NRS 116"), pursuant to the provisions of NRS 116.750.

FACTUAL ALLEGATIONS

1. RESPONDENT ASSOCIATION, Entity Number C2830-2001, consists of four hundred seven (407) lot sites in a common interest community located in Las Vegas, Nevada. **CICCH0001-0003.**

2. On May 21, 2024, COMPLAINANT Sharon Jossis, a site lot owner within RESPONDENT ASSOCIATION, filed an Intervention Affidavit with the Division. **CICCH0004-0009.**

3. The Affidavit, in part, alleged that RESPONDENT ASSOCIATION was required, but had failed to complete an Independent Auditor's Report for the year ending 2022. **CICCH0010-0011.**

4. The Division, subsequent to an investigation, and after contact with and receiving assurances from RESPONDENT ASSOCIATION and its then-counsel, concluded that the RESPONDENT ASSOCIATION was making satisfactory efforts to complete the 2022 Report, and accordingly closed its investigation file. **CICCH0020-0023.**

5. On August 12, 2025, COMPLAINANT filed a request that the Division reopen the case against RESPONDENT ASSOCIATION, stating that the statutorily required Report had not been completed and that a second such report for the year ending 2023 had also not been completed. **CICCH0024-0132.**

6. On September 12, 2025, Investigator Mr. Robert Towle of the Division sent a Request for Information to the Association, seeking copies of the 2022 and 2023 independent auditor's reports; subsequently, the Investigator approved extension requests on October 9, 2025, October 17, 2025, October 24, 2025, October 31, 2025, and November 10, 2025. **CICCH0133-0**.

7. In response to the new inquiry by the Division, RESPONDENT

ASSOCIATION submitted a copy of an engagement letter by Hilburn & Lein, certified public accountants, for the 2022 audit, dated January 18, 2023, of which the RESPONDENT ASSOCIATION'S Board of Directors had approved, as shown in the Board's meeting minutes. **CICCH0023-0026; CICCH0136-0264.**

8. The 2022 Audit had yet to be completed, according to the RESPONDENT ASSOCIATION'S counsel, Kurt R. Bonds of Hall & Evans, in a submission dated August 2, 2024, because up to this point RESPONDENT ASSOCIATION has had to rely upon others to do the remaining specialized work, which it claimed as necessary and a prerequisite to complete the audit, including specialized work requested from both the RESPONDENT ASSOCIATION'S former management company and the accountants specifically engaged from the 2022 Audit. The RESPONDENT ASSOCIATION acknowledged that it is not capable of performing this specialized work necessary for a compliant audit and has engaged a licensed CPA to do so. **CICCH0027-0135.**

9. The 2022 Audit, however, could not be started until the RESPONDENT ASSOCIATION completed its audit for 2021, which had also been delayed for reasons. **CICCH0027-0135.**

10. Because of concerns related to the 2021 audit, the RESPONDENT ASSOCIATION'S Board of Directors elected to take certain steps to ensure that the 2021 audit, and the impending 2022 Audit would be accurate, and requested that CAMCO, the ASSOCIATION'S then-management company, work with the ASSOCIATION'S then-Treasurer to revise the figures to reflect accurate information. **CICCH0027-0135.**

11. Despite the need for corrections as to its 2021 audit, RESPONDENT ASSOCIATION requested that its retained CPA firm would timely complete the 2022 Audit. **CICCH0027-0135.**

12. As a result, there were further delays in completing the 2022 Audit. **CICCH0027-0135.**

13. CAMCO thereafter stated that it would complete the outstanding work it remained responsible for completing, estimating at least 30 hours of work, and upon

completion, CAMCO would then forward that information to Mr. Lein. **CICCH0027-0135.**

14. Subsequently, as described in a Hall & Evans "Supplemental Response" dated November 25, 2025, CAMCO and Mr. Lein, the CPA, disagreed as to the documentation and contents necessary for the 2022 Audit. Mr. Lein indicated that he wanted certain postings to the financial documents to be made in 2022, rather than in 2023, and that the task of doing so was the responsibility of CAMCO and the prior management, Pinnacle Property Management. **CICCH0136-0264.**

15. The Supplemental Response did not, however, satisfactorily fully resolve the outstanding issues related to the missing and incomplete audits. **CICCH0136-0264.**

16. On January 12, 2026, Investigator Towle, having received an insufficient written response, sent RESPONDENT ASSOCIATION a Compliance Demand Letter indicating that the Division's investigation found potential violations of NRS 116 through application of NAC 116.457(1)(b) to have occurred and requesting the RESPONDENT ASSOCIATION provide its 2022 and 2023 audited financial statements to the Division within 21 days of the date of the letter. **CICCH0265-0266.**

17. On February 2, 2026, the Division received an email response from attorney Troy Dickerson for Hall & Evans. as counsel for RESPONDENT ASSOCIATION, together with various financial statements for both 2022 and 2023, prepared by Chen Accounting Group, CPA. **CICCH0267-0299.**

18. These statements were, however, insufficient and incomplete to qualify as proper audits, and did not meet statutory standards, in part because these audit reports disclosed several caveats and conditions, including those on pages 6 and 22, whereby the signatory noted that "...we have not been able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion on these financial statements." **CICCH0267-0299.**

19. On February 3, 2026, after its further investigation, the Division sent RESPONDENT ASSOCIATION an NRS 233B letter, via Certified Mail, notifying the RESPONDENT ASSOCIATION that the Division had obtained sufficient evidence,

referencing alleged violations of NRS 116.31144 and NAC 116.457(1)(b), to commence disciplinary action by filing a complaint as a result of its investigation. **CICCH0300-0301.**

VIOLATIONS OF LAW

1. RESPONDENT ASSOCIATION violated NRS 116.31144 and NAC 116.457(1)(b) on two separate and distinct instances and counts, by failing to complete audited financial statements in compliance with NRS 116 and NAC 116, for the years 2022 and 2023.

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 ASSOCIATION to take affirmative action to correct any conditions resulting from the violations.
2. Impose an administrative fine of up to $1,000 for each violation by RESPONDENT ASSOCIATION.
3. Order the RESPONDENT ASSOCIATION 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, if warranted, the application to a court of competent jurisdiction for the appointment of a receiver for the RESPONDENT ASSOCIATION.

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

NOTICE OF HEARING

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

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

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

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

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

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

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

DATED this 7th day of May, 2026.

REAL ESTATE DIVISION,
DEPARTMENT OF BUSINESS & INDUSTRY,
STATE OF NEVADA

By: _____

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