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NEVADA COMMISSION FOR
COMMON INTEREST COMMUNITIES
AND CONDOMINIUM HOTELS

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BEFORE THE COMMISSION FOR COMMON-INTEREST COMMUNITIES AND CONDOMINIUM HOTELS

STATE OF NEVADA

SHARATH CHANDRA, Administrator, REAL ESTATE DIVISION, DEPARTMENT OF BUSINESS AND INDUSTRY, STATE OF NEVADA,

Petitioner,

vs.

LAS VEGAS MOTORCOACH RESORT OWNERS ASSOCIATION, (Entity No. C2830-2001),

Respondent.

Case No.: 2024-454

RESPONDENT LAS VEGAS MOTOROACH RESORT OWNERS ASSOCIATION'S ANSWER TO COMPLAINT

COMES NOW, Respondent LAS VEGAS MOTORCOACH RESORT OWNERS ASSOCIATION (Entity No. C2830-2001) ("Respondent," "Association" or "HOA"), by and through its attorneys of record, HALL & EVANS, LLC, to answer Petitioner's Complaint for Disciplinary Action and Notice of Hearing ("Complaint") brought by the Real Estate Division, Department of Business and Industry, State of Nevada ("Division") filed with the Nevada

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Commission for Common-Interest Communities and Condominium Hotels ("Commission") on May 8, 2026, as follows:

JURISDICTION AND NOTICE ALLEGATIONS

The answering Respondent admits the Jurisdiction and Notice allegations contained in the Complaint, i.e., that at all times relevant to the Complaint, Respondent Las Vegas Motorcoach Resort Owners Association, Entity Number C2830-2001, has been a common-interest community located in Las Vegas, Nevada. As such, Respondent admits it is therefore 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. The answering Respondent admits those allegations contained in Paragraph 1 of the Complaint.

2. The answering Respondent admits those allegations contained in Paragraph 2 of the Complaint.

3. The answering Respondent generally admits those allegations contained in Paragraph 3 of the Complaint, but notes that the Commission documentation described as **CICCH0010-0011** for evidence in support of Paragraph 3 actually alleges that the Respondent Association was required, but had failed to complete, an Independent Auditor's report for the year ending 2023, not 2022 (*see* **CICCH0011**).

4. The answering Respondent generally admits those allegations contained in Paragraph 4 of the Complaint, but notes that the Commission documentation described as **CICCH0020-0023** for evidence in support of Paragraph 4's assertion that "[t]he Division concluded that the RESPONDENT ASSOCIATION was making satisfactory efforts to complete

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the 2022 Report, and accordingly closed its investigation file" should actually be the documentation described as **CICCH0013-0014.**

5. The answering Respondent generally admits those allegations contained in Paragraph 5 of the Complaint, but notes that the Commission documentation described as **CICCH0024-0132** for evidence in support of Paragraph 5's assertion that "COMPLAINANT filed a request that the Division reopen the case against RESPONDENT ASSOCIATION, stating that the statutory required Report had not been completed and that a second such report for the year ending 2023 had also not been completed" should also include the documentation described as **CICCH0015-0016**, which shows that Complainant's Ombudsman Intervention Affidavit Reopening Request was actually dated August 10, 2025, and received by the Division on August 18, 2025.

6. The answering Respondent generally admits those allegations contained in Paragraph 6 of the Complaint, but notes that the Commission documentation described as **CICCH0133-0** for evidence in support of Paragraph 6's assertion that "[o]n September 12, 2025, Investigator Mr. Robert Towle of the Division sent a Request for Information, seeking copies of the 2022 and 2023 independent auditor's reports" should also include the documentation described as **CICCH0020-0022.**

7. The answering Respondent admits those allegations contained in Paragraph 7 of the Complaint.

8. The answering Respondent admits those allegations contained in Paragraph 8 of the Complaint.

9. The answering Respondent admits those allegations contained in Paragraph 9 of the Complaint.

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10. The answering Respondent admits those allegations contained in Paragraph 10 of the Complaint.

11. The answering Respondent admits those allegations contained in Paragraph 11 of the Complaint.

12. The answering Respondent admits those allegations contained in Paragraph 12 of the Complaint.

13. The answering Respondent admits those allegations contained in Paragraph 13 of the Complaint.

14. The answering Respondent admits in part and denies in part the allegations contained in Paragraph 14 of the Complaint.

Respondent admits that the assertion that "CAMCO and Mr. Lien, the CPA, disagreed as to the documentation and contents necessary for the 2022 Audit" and that "Mr. Lien 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" was made in Respondent's November 25, 2025, Supplemental Response to the Division.

Respondent denies the assertion that Mr. Lien ever 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 also the responsibility "the prior management, Pinnacle Property Management" in Respondent's November 25, 2025, Supplemental Response to the Division.

15. The answering Respondent states that it does not have sufficient knowledge or information upon which to base a belief as to the truth of the allegations contained in Paragraph 15 of the Complaint, and upon said grounds therefore denies each and every allegation contained therein.

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16. The answering Respondent admits the allegations contained in Paragraph 16 of the Complaint.

17. The answering Respondent admits the allegations contained in Paragraph 17 of the Complaint.

18. The answering Respondent states that it does not have sufficient knowledge or information upon which to base a belief as to the truth of the allegations contained in Paragraph 18 of the Complaint, and upon said grounds therefore denies each and every allegation contained therein.

19. The answering Respondent admits those allegations contained in Paragraph 19 of the Complaint.

RESPONDENTS' DEFENSES TO ALLEGATIONS OF VIOLATIONS OF LAW

The Complaint alleges the following Violations of Law against the Respondents:

1. RESPONDENT ASSOCIATION violated NRS 116.31144 and NAC 16.457(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.

Respondent hereby answers and states the following defenses in response to alleged Violation No. 1 of the Complaint as follows:

A. The Allegations Against Respondent for Violation of Any Statute or Administrative Code Was Caused in Whole or in Part by the Acts, Omissions, or Conduct of Third Parties Over Whom the Respondent Has Limited or No Control.

1. The answering Respondent Association has represented throughout the Division's investigation that the Association has every intention of completing the referenced audits for 2022 and 2023 to the Division's satisfaction, whenever that work was completed.

2. Throughout the Division's investigation, the audits were not completed as previously anticipated by the Respondent Association up to certain points requested because the

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Respondent Association understandably had to completely rely upon others to do the remaining specialized work which was necessary to complete the audits.

3. Such specialized work was regularly and repeatedly requested by the Respondent Association from the Respondent's former management company (CAMCO) and the accountants specifically engaged by the Respondent for the 2022 audit throughout the course of the Division's investigation.

4. The Respondent Association regularly and repeatedly advised the Division throughout the investigation that the Respondent Association itself was not capable of doing such specialized work on Respondent's own volition in order to obtain completion of the audits, but was completely reliant upon that work being completed by others.

5. Moreover, completion of certain audits requires the progression and completion of prior audits first before the next annual audit can be completed, i.e., the 2022 audit could not be started until the completion of the Association's 2021 audit; the 2023 audit could not be started until the completion of the Association's 2022 audit, etc.

6. Upon information and belief, the Division/Commission's dissatisfaction with the 2022 and 2023 Financial Statements and Supplementary Information for the Fiscal Years Ended December 31, 2022, and December 31, 2023, bate-numbered as **CICCH0269-0284** and **CICCH0285-0299**, respectively, as previously submitted by the Respondent Association on or about February 2, 2026, has been caused in whole or in part by the acts, omissions, or conduct of third parties over whom the Respondent Association has limited or no control.

B. <u>The Respondent Association has Continued to Attempt to Obtain the Information Necessary to Update the 2022 and 2023 Audits to the Division/Commission's Satisfaction While The Captioned Proceedings have been Ongoing.</u>

1. Since the NRS 233B letter dated February 3, 2026, was sent to the Respondent Association via certified mail in February 2026 by the Division, the Respondent Association has

continued to take regular and repeated actions in good faith in an attempt to obtain the information necessary to update/complete the 2022 and 2023 audits to the satisfaction of the Division/Commission.

2. Since the Complaint in the captioned action was filed by the Commission on May 8, 2026, the Respondent Association has continued to take regular and repeated actions in good faith in an attempt to obtain the information necessary to update/complete the 2022 and 2023 audits to the satisfaction of the Division/Commission.

3. In March 2026, the Respondent Association made a detailed request in writing to its previous management company, CAMCO, for specific information sufficient to support certain transactions and account balances requested by the Association's current auditor for the 2022 and 2023 audits during which CAMCO was the Association's management company for the majority of that time and which, upon information and belief, will enable the Association's current auditor to be able to update the audits and express an opinion regarding the same to the satisfaction of the Division/Commission.

4. Over the course of approximately five (5) weeks after the March 2026 request in writing was sent by the Respondent Association to CAMCO, CAMCO never responded to the Association's request.

5. In April 2026, the Respondent Association made a follow-up detailed request in writing to CAMCO again for specific information sufficient to support certain transactions and account balances requested by the Association's current auditor for the 2022 and 2023 audits during which CAMCO was the Association's management company for the majority of that time and which, upon information and belief, will enable the Association's current auditor to be able to update the audits and express an opinion regarding the same to the satisfaction of the Division/Commission.

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6. CAMCO responded shortly after the April 2026 request in writing was sent to the Respondent Association but did not provide any of the requested information.

7. In June 2026, the undersigned Respondent Association's attorney made a request in writing to CAMCO's President for a teleconference to discuss the pending requests previously made by the Association regarding the 2022 and 2023 audits.

8. A teleconference was subsequently scheduled and conducted on June 25, 2026, between the undersigned Respondent Association's attorney and CAMCO's President and CFO to discuss the history of the account and certain financial details related to the information requested.

9. At the June 25, 2026, teleconference described, CAMCO's attending principals communicated to the Respondent Association's legal counsel that they are willing to work with the Respondent in a way that will help to facilitate some or all of the requested information with enough expediency that the necessary audit information can be subsequently obtained sufficient to enable the Association's current auditor to be able to update the 2022 and 2023 audits and express an opinion regarding the same to the satisfaction of the Division/Commission before the current disciplinary hearing scheduled for September 2026 is scheduled to go forward.

Based upon the above, no discipline is warranted against the Respondent based upon any allegations made in the Complaint and/or any records provided to or relied upon by the Division in the Complaint. As noted, the Respondent Association continues to regularly and repeatedly take actions to attempt to obtain and provide the audit information necessary to satisfy the Division/Commission regarding the 2022 and 2023 audits which are the subject of these proceedings.

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The Respondent reserves the right to amend this Answer based upon any additional developments in this case which may or may not occur prior to the disciplinary hearing proceedings currently scheduled before the Commission in September 2026.

DATED this 30th day of June, 2026.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 30th day of June, 2026, the foregoing **RESPONDENT LAS VEGAS MOTOROACH RESORT OWNERS ASSOCIATION'S ANSWER TO COMPLAINT** was served by hand-delivering signed copies of the Answer to the following:

COMMISSION OF COMMON-INTEREST
COMMUNITIES AND CONDOMINIUM HOTELS
3300 W. Sahara Avenue, Suite 350
Las Vegas, Nevada 89102
Attn: Commission Coordinator

WILLIAM C. PEPER
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1 State of Nevada Way, Ste. 100
Las Vegas, Nevada 89119

/s/ Lisa Salgado-Guerrero
An Employee of HALL & EVANS, LLC