IN THE SUPREME COURT OF THE STATE OF NEVADA

NONA TOBIN, as Trustee of the GORDON B. HANSEN TRUST dated 8/22/08,

Appellants,

vs.

JOEL A. STOKES and SANDRA F. STOKES, as Trustees of the JIMIJACK IRREVOCABLE TRUST; YUEN K. LEE, an individual, d/b/a Manager, F. BONDURANT, LLC., SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC.; AND NATIONSTAR MORTGAGE, LLC,

Respondents.

Electronically Filed
Dec 19 2019 04:53 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court Case No.: 79295

District Court Case No A-15-720032-C
Consolidated with A-16-730078-C

APPELLANT'S APPENDIX OF DOCUMENTS

VOLUME IV of XIV

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Volume	Document	Bates No.
I	Affidavit of Nona Tobin in Support of Nona Tobin and Steve Hansen's Motion to Intervene	AA 000151 - AA 000163
V	Amended Notice of Entry of Stipulation and Order Reforming Caption	AA 001025 - AA001034
XIV	Amended Transcript of Proceedings of Pretrial Conference to Correct Attorney Name Only 04/25/19	AA 002837 - AA 002860
XIV	Amended Transcript to Correct Title of Motion: Third Parties Nona Tobin and Steve Hansen's Motion to Intervene 09/29/16	AA 002885 - AA 002899
XIV	Case Appeal Statement	AA 002865 - AA 002869
I	Complaint	AA 000001- AA 000009
X	Counterclaimant, Nona Tobin's [Proposed] Findings of Fact and Conclusions of Law	AA 001906 - AA 001921
V	Cross-Claimant Nona Tobin's Opposition to Cross-Defendant Sun City Anthem Community Association's Motion for Summary Judgment	AA 000879 - AA 000994
IV	Cross-Defendant Sun City Anthem Community Association's Answer to Cross-Claims by Nona Tobin, An Individual and Trustee of the Gordon B. Hansen Trust	AA 000644 - AA 000651
IV	Cross-Defendant Sun City Anthem Community Association's Motion for Summary Judgment	AA 000652 - AA 000826
III	Cross-Defendant Sun City Anthem Community Association's Motion to Dismiss Nona Tobin's Cross-Claims	AA 000519 - AA 000529
VIII	Cross-Defendant Sun City Anthem Community Association's Opposition to Cross-Claimant Nona Tobin's Motion for Reconsideration	AA 001356 - AA 001369
V	Cross-Defendant Sun City Anthem Community Association's Reply in Support of its Motion for Summary Judgment	AA 000995 - AA 001008
I	Defendant in Intervention Nationstar Mortgage, LLC's Answer to Plaintiffs' Complaint and Counterclaim	AA 000057 - AA 000126
III	Disclaimer of Interest	AA 000530 - AA 000534
V	Findings of Fact, Conclusions of Law and Order on Cross-Defendant Sun City Anthem Community Association's Motion for Summary Judgment	AA 001035 - AA 001044
III	Initial Appearance Fee Disclosure	AA 000424 - AA 000426
I	Jimijack Irrevocable Trust's Motion to Consolidate Case No. A-16-730078-C and Case No. A-15-720032-C	AA 000136 - AA 000140

VIII	Joel Stokes and Sandra F. Stokes, As Trustees of the JimiJack Irrevocable Trust's, Joinder to Sun City Anthem Community Association's Opposition to Nona Tobin's Motion for Reconsideration	AA 001373 - AA 001375
I	Judgment by Default Against Defendant Bank of America	AA 000010 - AA 000011
VI	Motion for Reconsideration (Part 1)	AA 001102 - AA 001300
VII	Motion for Reconsideration (Part 2)	AA 001301 - AA 001353
II	Motion to Intervene into Consolidated Quiet Title Cases A-15-720032-C and Former Case A-16-730078	AA 000164 - AA 000281
I	Motion to Substitute Party, Intervene and Set Aside Default Judgment	AA 000012 - AA 000056
IV	Nationstar Mortgage, LLC's Limited Joinder to Sun City Anthem Community Association's Motion for Summary Judgment	AA 000827 - AA 000861
VIII	Nationstar Mortgage, LLC's Limited Joinder to Sun City Anthem Community Association's Opposition to Nona Tobin's Motion for Reconsideration	AA 001370 - AA 001372
I	Nationstar Mortgage, LLC's Non-Opposition to JimiJack Irrevocable Trust's Motion to Consolidate	AA 000141 - AA 000143
V	Nationstar Mortgage, LLC's Response to Nona Tobin's Opposition to Nationstar Mortgage, LLC's Motion for Summary Judgment Against JimiJack and Countermotion for Summary Judgment	AA 001059 - AA 001101
III	Nona Tobin's Answer to Plaintiff's Complaint and Counterclaim	AA 000386 - AA 000423
III	Nona Tobin's Crossclaim Against Thomas Lucas D/B/A Opportunity Homes, LLC	AA 000451 - AA 000509
III	Nona Tobin's Crossclaim Against Yuen K. Lee d/b/a F. Bondurant, LLC	AA 000427 - AA 000450
II	Nona Tobin's Crossclaim for Quiet Title Against Sun City Anthem Community Association, Inc. (HOA)	AA 000290 - AA 000385
XII	Nona Tobin's Declarations in Support of MINV as an Individual	AA 002339 - AA 002550
X	Nona Tobin's Motion to Intervene as an Individual Per Rule 24 (Part 1)	AA 001922 - AA 002076
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XIV	Notice of Appeal	AA 002862 - AA 002864

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III	Notice of Entry of Order Denying Motion for Summary Judgment	AA 000620 - AA 000625
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IV	Notice of Entry of Order Granting Thomas Lucas and Opportunity Homes, LLC's Motion for Summary Judgment	AA 000633 - AA 000643
V	Notice of Entry of Stipulation and Order for Dismissal Without Prejudice as to Claims Against Opportunity Homes, LLC and F. Bondurant, LLC	AA 000868 - AA 000878
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I	Order Granting Motion to Consolidate and Denying Motion for Summary Judgment	AA 000144 - AA 000145

IV	Order Granting Thomas Lucas and Opportunity Homes, LLC's Motion for Summary Judgment	AA 000626 - AA 000632
XII	Order on Findings of Fact, Conclusions of Law and Judgment	AA 002551 - AA 002564
I	Plaintiff, JimiJack Irrevocable Trust's, Opposition to Nona Tobin and Steve Hansen's Motion to Intervene	AA 000146 - AA 000150
XIV	Recorder's Transcript Bench Trial Day 2 06/06/19	AA 002926 - AA 002960
XIV	Recorder's Transcript of Hearing All Pending Motions 09/26/19	AA 002870 - AA 002884
XIV	Recorder's Transcript of Hearing Nona Tobin's Motion to Intervene into Consolidated Quiet Title Cases A-15-720032-C and Former Case A-16-730078-C 12/20/16	AA 002900 - AA 002909
XIV	Recorder's Transcript of Hearing Sun City Anthem Community Association's Motion to Dismiss Nona Tobin, an Individual and Trustee of the Gordon B. Hansen Trust's Cross-Claim 03/28/17	AA 002910 - AA 002925
XIII	Recorder's Transcript of Hearing: All Pending Motions April 23, 2019	AA 002608 - AA 002640
XIII	Recorder's Transcript of Hearing: All Pending Motions April 27, 2017	AA 002581 - AA 002607
VIII	Reply to Cross-Defendant Sun City Anthem Community Association's Opposition to Tobin's Motion for Reconsideration (Part 1)	AA 001376 - AA 001576
IX	Reply to Cross-Defendant Sun City Anthem Community Association's Opposition to Tobin's Motion for Reconsideration (Part 2)	AA 001577 - AA 001826
X	Reply to Cross-Defendant Sun City Anthem Community Association's Opposition to Tobin's Motion for Reconsideration (Part 3)	AA 001827 - AA001884
III	Reply to Sun City Anthem Community Association's Reply in Support of its Motion to Dismiss	AA 000559 - AA 000583
IV	Stipulation and Order for Dismissal Without Prejudice as to Claims Against Opportunity Homes, LLC and F. Bondurant LLC	AA 000862 - AA 000867
X	Stipulation and Order for the Dismissal of Nationstar Mortgage, LLC's Claims Against Jimijack Irrevocable Trust with Prejudice	AA 001896 - AA 001898
V	Stipulation and Order Reforming Caption	AA 001009 - AA 001014
III	Sun City Anthem Community Association's Motion to Dismiss Nona Tobin, an Individual and Trustee of the Gordon B. Hansen Trust's Cross-Claim	AA 000510 - AA 000518
III	Sun City Anthem Community Association's Reply in Support of its Motion to Dismiss	AA 000584 - AA 000591

III	Thomas Lucas and Opportunity Homes, LLC's Reply to Nona Tobin's Opposition to Motion for Summary Judgment	AA 000592 - AA 000600
XIII	Transcript of Proceedings: All Pending Motions 01/10/19	AA 002657 - AA 002666
XIII	Transcript of Proceedings: All Pending Motions 03/26/19	AA 002667 - AA 002701
XIII	Transcript of Proceedings: All Pending Motions 05/25/17	AA 002641 - AA 002656
XIII	Transcript of Proceedings: All Pending Motions 05/29/19	AA 002751 - AA 002778
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XIII	Transcript of Proceedings: Pretrial Conference 04/25/19	AA 002702 - AA 002725
XIII	Transcript of Proceedings: Status Check - Settlement Documents 05/21/19	AA 002726 - AA 002750

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8/9/2017 1:57 PM
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EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

JOEL A. STOKES and SANDRA F. STOKES, as Trustees of the JIMIJACK IRREVOCABLE TRUST, Plaintiffs, vs. BANK OF AMERICA, N.A.; SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC.; DOES I Through X, and ROES 1 Through 10, Inclusive, Defendants.	CASE NO.: A-15-720032-C DEPT. NO.: XXXI **ORDER GRANTING THOMAS LUCAS and OPPORTUNITY HOMES, LLC'S MOTION FOR SUMMARY JUDGMENT**
NATIONSTAR MORTGAGE, LLC, Counterclaimant, vs. JIMIJACK IRREVOCABLE TRUST; OPPORTUNITY HOMES, LLC, a Nevada Limited Liability Company; F. BONDURANT, LLC, a Nevada Limited Liability Company; DOES I Through X, and ROES XI Through XX, Inclusive, Counterdefendants,	
NONA TOBIN, an Individual and Trustee of the GORDON B. HANSEN TRUST, dated 8/22/25, Crossclaimant, vs. THOMAS LUCAS, and SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC.; DOES I Through X, and ROES I Through X, Inclusive, Crossdefendants.	

06-29-1 11:32 IN

Counterdefendant Opportunity Homes, LLC, and Crossdefendant Thomas Lucas's Motion for Summary Judgment ("Motion for Summary Judgment") came on for hearing on April 27, 2017 at the hour of 9:30 a.m., Opportunity Homes and Thomas Lucas being represented by Jakub P. Medrala, Esq., of The Medrala Law Firm, PLLC and Crossclaimant Nona Tobin appearing *pro se.*

The Court having reviewed the pleadings and papers on file herein, having heard the arguments of counsel, and good cause appearing therefore, the Court issues the following Findings of Fact and Conclusions of Law, and Order:

FINDINGS OF FACT

On or about August 15, 2014, pursuant to NRS 116.3116 *et seq.*, Sun City Anthem Community Association, Inc. ("HOA") conducted a public auction and foreclosed on its lien for delinquent assessments on real property commonly known as 2763 White Sage Drive, Henderson, NV 89052, APN 191-13-811-052 ("the Property").

Opportunity Homes, LLC ("Opportunity Homes") was the highest bidder at the subject action and purchased its interest in the Property in exchange for $63,100.

Prior to the foreclosure, the Property's owner of record was Gordon B. Hansen, Trustee of the Gordon B. Hansen Trust, dated August 22, 2008.

Thereafter, on June 4, 2015, Opportunity Homes transferred its interest in the Property to F. Bondurant, LLC, by way of a Quitclaim Deed. Therefore, Opportunity Homes no longer claimed any interest in the Property.

Crossdefendant Thomas Lucas is a sole member of the Counterdefendant Opportunity Homes. Nona Tobin claims to be a "successor trustee" of the Gordon B. Hansen Trust, dated August 22, 2008.

Neither Opportunity Homes, nor Mr. Lucas has ever entered into any agreements with Nona Tobin.

Nona Tobin filed a crossclaim against Tom Lucas for quiet title to the Property, breach of contract, declaratory relief and civil conspiracy.

CONCLUSIONS OF LAW

1.0 STANDARD OF REVIEW

In Nevada, a party's motion for summary judgment must be granted, "if the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law." NRCP 56(c); *See also Wood v. Safeway, Inc.*, 121 Nev. 724, 731, 121 P.3d 1026, 1031 (2005) (rejecting the slightest doubt standard and adopting the federal standard set forth in *Liberty Lobby*, *Celotex*, and *Matsushita*). "[C]onclusory statements along with general allegations do not create an issue of fact." *Yeager v. Harrah's Club, Inc.*, 111 Nev. 830, 833, 897 P.2d 1093, 1095 (1995). Rather, a genuine issue of material fact exists only where the evidence is such that a reasonable trier of fact could return a verdict for the nonmoving party; other factual disputes are irrelevant. *Wood*, 121 Nev. at 731, 121 P.3d at 1031.

2.0 THOMAS LUCAS'S MOTION FOR SUMMARY JUDGMENT MUST BE GRANTED

A. Neither Opportunity Homes, LLC, Nor Thomas Lucas Claim Any Interest in the Subject Property; Therefore, Neither of Them Can Be a Part of a Quiet Title Action

An action for quiet title in real property is a statutory cause of action prescribed by NRS 40.010, which states:

> An action may be brought by any person against another who claims an estate or interest in real property, adverse to the person bringing the action, for the purpose of determining such adverse claim.

Thus, an action pursuant to NRS 40.010 requests a judicial determination of all adverse claims to disputed property. *Clay v. Scheeline Banking & Trust Co.*, 40 Nev. 9, 159 P. 1081, 1082-83 (1916).

From reading the express language of the statute, one of the elements of a quiet title action is that the defendant may claim "an estate or interest in real property, adverse to the person bringing the action." NRS. 40.010.

In the present case, neither Opportunity Homes nor Mr. Lucas claims any interest in the Property. While Opportunity Homes purchased the subject Property at the HOA auction on August 15, 2014, it also sold its interest in the Property on June 4 2015, to F. Bondurant, LLC.

Tobin's crossclaim for quiet title against Mr. Lucas[1] was filed on February 1, 2017, more than two years after Opportunity Homes sold its interest in the Property.

Accordingly, because neither Opportunity Homes nor Mr. Lucas claims any interest in the Property that is adverse to Tobin's interests, her quiet title claims against Mr. Lucas must be dismissed.

B. Neither Opportunity Homes, LLC, Nor Mr. Lucas Were Parties to Any Agreements With Tobin That They Could Possibly Breach

Under Nevada law, to prove a claim for breach of contract, the following elements must be proven: (1) the plaintiff and defendant entered into a valid and existing contract, (2) plaintiff performed or was excused from performance, (3) defendant failed to perform and was not

[1] Mr. Lucas has never claimed any interest in the Property. Instead, it was Mr. Lucas's company, Opportunity Homes, LLC, which purchased the Property at the subject foreclosure sale. However, Tobin did not join Opportunity Homes in her crossclaim, and it appears that she named Mr. Lucas on a theory that Opportunity Homes, LLC, is Mr. Lucas's alter ego (Crossclaim, ¶¶ 25-33). Although Mr. Lucas denies such allegations and that he registered Opportunity Homes, LLC, to "further . . . unfair enterprise and concealing and perpetuating unlawful conveyance of the Subject Property" as alleged in Paragraph 82 of the Crossclaim, whether or not Opportunity Homes, LLC, is Mr. Lucas's alter ego is immaterial to the issues raised in this action because neither Opportunity Homes nor Mr. Lucas claim any interest in the subject Property, and neither Opportunity Homes nor Mr. Lucas were parties to any agreements with Tobin.

excused from performance, and (4) plaintiff sustained damages as a result of the breach. *Calloway v. City of Reno*, 116 Nev. 250, 993 P.2d 1259 (2000).

In her crossclaim, Tobin alleges that she had an Exclusive Right to Sell (ER) listing agreement with Craig Leidy and Forest Barbee to list and sell the Property. She further alleges that Mr. Lucas is a real estate agent working under BHHS, and that: (1) he had actual or constructive knowledge that the beneficiary of the deed of trust refused to close multiple escrows (Crossclaim, ¶ 59); (2) he knew Nationstar was not the beneficiary of the deed of trust (*Id.*); (3) he told Leidy that he was the buyer, that he was going to keep the Property, and that he contacted Leidy before the sale of the property (Crossclaim, ¶ 60).

Not only do Tobin's allegations fail to state a claim for a breach of contract against Mr. Lucas, or even any other claim for relief as she did not allege any facts that would indicate that Mr. Lucas breached any legal obligations, but the main problem with Tobin's claim is that it does not allege that Mr. Lucas has entered into any agreement with Tobin that he could possibly breach. Indeed, Mr. Lucas has never entered into any agreements with Tobin.

While it is true that Mr. Lucas is a real estate licensee and an independent agent working with BHHS, BHHS is a real estate company that employs more than 800 real estate agents in Las Vegas valley alone, and Mr. Lucas is not bound by the agreements that Tobin could have signed with other BHHS's agents.

Tobin neither alleges any contractual relationship between her and Mr. Lucas, nor has she produced any evidence of a contractual relationship that could give rise to a breach of contract claim against him. Accordingly, no issue of material fact exists regarding whether Mr. Lucas breached any agreement with Tobin, and Tobin's claims must be dismissed.

C. Tobin Failed to Show Any Facts Indicating that Mr. Lucas Committed Civil Conspiracy.

To prevail in a civil conspiracy action in Nevada, plaintiff must prove an agreement between the tortfeasors; whether explicit or tacit, with an intent to accomplish an unlawful objective for the purpose of harming plaintiff; and that the plaintiff sustained damage resulting from defendants' act or acts. *Guilfoyle v. Olde Monmouth Stock Transfer Company, Co., Inc.*, 335 P.3d 190 (Nev. 2014); *Consol. Generator-Nevada, Inc. v. Cummins Engine Co.*, 114 Nev. 1304, 971 P. 2d 1251 (1999); *Dow Chemical Co. v. Mahlum*, 114 Nev. 1468, 970 P.2d 98 (1998).

In opposing Thomas Lucas and Opportunity Homes' Motion for Summary Judgment, Tobin failed to submit any evidence supporting her claim for civil conspiracy. Moreover, Tobin failed to even allege the existence of Mr. Lucas's agreement with anyone whose objective would be unlawful. Accordingly, her claim for civil conspiracy must be dismissed.

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ORDER

Based on the foregoing Findings of Facts and Conclusions of Law, the Court hereby **ORDERS, ADJUDGES AND DECREES** as follows:

1. Thomas Lucas and Opportunity Homes' Motion for Summary Judgment against Nona Tobin is **GRANTED**.
2. Nona Tobin's Crossclaim Against Thomas Lucas d/b/a Opportunity Homes, LLC is **DISMISSED** in its entirety.

Dated this 21 day of July, 2017.

for Dept 31

DISTRICT COURT JUDGE

HK

Respectfully submitted by:
The Medrala Law Firm, PLLC

Jakub P. Medrala, Esq. (SNB 12822)
1091 S. Cimarron Road, Ste. A-1
Las Vegas, Nevada 89145
Attorney for Thomas Lucas and Opportunity Homes, LLC

Approved as to form and content:

(not signed)

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TO: ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD.

PLEASE TAKE NOTICE that an ORDER GRANTING THOMAS LUCAS and OPPORTUNITY HOMES, LLC'S MOTION FOR SUMMARY JUDGMENT was entered in the above-entitled action on the 9th day of August 2017.

A true and correct copy of said Order is attached hereto as Exhibit "1".

Dated this 11th day of August 2017.

THE MEDRALA LAW FIRM, PROF. LLC

/s/ Jakub P. Medrala

JAKUB P. MEDRALA, ESQ.
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1091 S. Cimarron Road, Suite A-1
Las Vegas, Nevada 89145
Attorney for Defendants/Counterclaimants Jaroslaw R. Jastrebski, Zachary England, and Robert Smith

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on August 11, 2017, I served a true and correct copy of the foregoing NOTICE OF ENTRY OF ORDER GRANTING THOMAS LUCAS and OPPORTUNITY HOMES, LLC'S MOTION FOR SUMMARY JUDGMENT via the E-Service Master List for the above-referenced matter in the Eighth Judicial District Court's e-filing system in accordance with the electronic service requirements of Administrative Order 14-2 and the Nevada Electronic Filing and Conversion Rules, and, if necessary, by depositing a copy of the same into the U.S. Postal Service at Las Vegas, Nevada, prepaid first-class postage affixed thereto, addressed to the following:

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2664 Olivia Heights Avenue
Henderson, Nevada 89052
Telephone: (702) 465-2199
nonatobin@gmail.com

By: */s/ Shuchi Patel*
An employee of THE MEDRALA LAW FIRM, PROF. LLC

EXHIBIT 1

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2.0 THOMAS LUCAS'S MOTION FOR SUMMARY JUDGMENT MUST BE GRANTED

A. Neither Opportunity Homes, LLC, Nor Thomas Lucas Claim Any Interest in the Subject Property; Therefore, Neither of Them Can Be a Part of a Quiet Title Action

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> An action may be brought by any person against another who claims an estate or interest in real property, adverse to the person bringing the action, for the purpose of determining such adverse claim.

Thus, an action pursuant to NRS 40.010 requests a judicial determination of all adverse claims to disputed property. *Clay v. Scheeline Banking & Trust Co.*, 40 Nev. 9, 159 P. 1081, 1082-83 (1916).

From reading the express language of the statute, one of the elements of a quiet title action is that the defendant may claim "an estate or interest in real property, adverse to the person bringing the action." NRS. 40.010.

In the present case, neither Opportunity Homes nor Mr. Lucas claims any interest in the Property. While Opportunity Homes purchased the subject Property at the HOA auction on August 15, 2014, it also sold its interest in the Property on June 4, 2015, to F. Bondurant, LLC.

Tobin's crossclaim for quiet title against Mr. Lucas[1] was filed on February 1, 2017, more than two years after Opportunity Homes sold its interest in the Property.

Accordingly, because neither Opportunity Homes nor Mr. Lucas claims any interest in the Property that is adverse to Tobin's interests, her quiet title claims against Mr. Lucas must be dismissed.

B. Neither Opportunity Homes, LLC, Nor Mr. Lucas Were Parties to Any Agreements With Tobin That They Could Possibly Breach

Under Nevada law, to prove a claim for breach of contract, the following elements must be proven: (1) the plaintiff and defendant entered into a valid and existing contract, (2) plaintiff performed or was excused from performance, (3) defendant failed to perform and was not

[1] Mr. Lucas has never claimed any interest in the Property. Instead, it was Mr. Lucas's company, Opportunity Homes, LLC, which purchased the Property at the subject foreclosure sale. However, Tobin did not join Opportunity Homes in her crossclaim, and it appears that she named Mr. Lucas on a theory that Opportunity Homes, LLC, is Mr. Lucas's alter ego (Crossclaim, ¶¶ 25-33). Although Mr. Lucas denies such allegations and that he registered Opportunity Homes, LLC, to "further . . . unfair enterprise and concealing and perpetuating unlawful conveyance of the Subject Property" as alleged in Paragraph 82 of the Crossclaim, whether or not Opportunity Homes, LLC, is Mr. Lucas's alter ego is immaterial to the issues raised in this action because neither Opportunity Homes nor Mr. Lucas claim any interest in the subject Property, and neither Opportunity Homes nor Mr. Lucas were parties to any agreements with Tobin.

excused from performance, and (4) plaintiff sustained damages as a result of the breach. *Calloway v. City of Reno*, 116 Nev. 250, 993 P.2d 1259 (2000).

In her crossclaim, Tobin alleges that she had an Exclusive Right to Sell (ER) listing agreement with Craig Leidy and Forest Barbee to list and sell the Property. She further alleges that Mr. Lucas is a real estate agent working under BHHS, and that: (1) he had actual or constructive knowledge that the beneficiary of the deed of trust refused to close multiple escrows (Crossclaim, ¶ 59); (2) he knew Nationstar was not the beneficiary of the deed of trust (*Id.*); (3) he told Leidy that he was the buyer, that he was going to keep the Property, and that he contacted Leidy before the sale of the property (Crossclaim, ¶ 60).

Not only do Tobin's allegations fail to state a claim for a breach of contract against Mr. Lucas, or even any other claim for relief as she did not allege any facts that would indicate that Mr. Lucas breached any legal obligations, but the main problem with Tobin's claim is that it does not allege that Mr. Lucas has entered into any agreement with Tobin that he could possibly breach. Indeed, Mr. Lucas has never entered into any agreements with Tobin.

While it is true that Mr. Lucas is a real estate licensee and an independent agent working with BHHS, BHHS is a real estate company that employs more than 800 real estate agents in Las Vegas valley alone, and Mr. Lucas is not bound by the agreements that Tobin could have signed with other BHHS's agents.

Tobin neither alleges any contractual relationship between her and Mr. Lucas, nor has she produced any evidence of a contractual relationship that could give rise to a breach of contract claim against him. Accordingly, no issue of material fact exists regarding whether Mr. Lucas breached any agreement with Tobin, and Tobin's claims must be dismissed.

C. Tobin Failed to Show Any Facts Indicating that Mr. Lucas Committed Civil Conspiracy.

To prevail in a civil conspiracy action in Nevada, plaintiff must prove an agreement between the tortfeasors; whether explicit or tacit, with an intent to accomplish an unlawful objective for the purpose of harming plaintiff; and that the plaintiff sustained damage resulting from defendants' act or acts. *Guilfoyle v. Olde Monmouth Stock Transfer Company, Co., Inc.*, 335 P.3d 190 (Nev. 2014); *Consol. Generator-Nevada, Inc. v. Cummins Engine Co.*, 114 Nev. 1304, 971 P. 2d 1251 (1999); *Dow Chemical Co. v. Mahlum*, 114 Nev. 1468, 970 P.2d 98 (1998).

In opposing Thomas Lucas and Opportunity Homes' Motion for Summary Judgment, Tobin failed to submit any evidence supporting her claim for civil conspiracy. Moreover, Tobin failed to even allege the existence of Mr. Lucas's agreement with anyone whose objective would be unlawful. Accordingly, her claim for civil conspiracy must be dismissed.

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ORDER

Based on the foregoing Findings of Facts and Conclusions of Law, the Court hereby **ORDERS, ADJUDGES AND DECREES** as follows:

1. Thomas Lucas and Opportunity Homes' Motion for Summary Judgment against Nona Tobin is **GRANTED**.
2. Nona Tobin's Crossclaim Against Thomas Lucas d/b/a Opportunity Homes, LLC is **DISMISSED** in its entirety.

Dated this 21 day of July, 2017.

for Dec 31

DISTRICT COURT JUDGE

HK

Respectfully submitted by:
The Medrala Law Firm, PLLC

Jakub P. Medrala, Esq. (SNB 12822)
1091 S. Cimarron Road, Ste. A-1
Las Vegas, Nevada 89145
Attorney for Thomas Lucas and Opportunity Homes, LLC

Approved as to form and content:

(not signed)

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DISTRICT COURT

CLARK COUNTY, NEVADA

JOEL A. STOKES and SANDRA F. STOKES, as trustee for the JIMIJACK IRREVOCABL TRUST, Plaintiffs, vs. BANK OF AMERICA, N.A.; SUN CITY ANTHEM COMMUNITY ASSOCIATION.; DOES I through X and ROES BUISNESS ENTITIES 1 through 10, inclusive, Defendants.	CASE NO.: A-15-720032-C Dept. XXXI **CROSS-DEFENDANT SUN CITY ANTHEM COMMUNITY ASSOCIATION'S ANSWER TO CROSS-CLAIMS BY NONA TOBIN, AN INDIVUDUAL AND TRUSTEE OF THE GORDON B. HANSEN TRUST**
NONA TOBIN, an individual and Trustee of the GORDON B. HANSEN TRUST, dated 8/22/25, Counter-Claimant, vs. JOEL A. STOKES and SANDRA F. STOKES, as trustee for the JIMIJACK IRREVOCABL TRUST, Counter-Defendant.	
NONA TOBIN, an individual and Trustee of the GORDON B. HANSEN TRUST, dated 8/22/25, Cross-Claimant, vs. SUN CITY ANTHEM COMMUNITY	

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ASSOCATION, INC., DOES 1-10, and
ROE CORPORATIONS 1-10, inclusive,

Cross-Defendant.

Cross-Defendant Sun City Anthem Community Association ("Sun City Anthem" or HOA"), by and through its counsel of record LIPSON NEILSON P.C., hereby submits its Answer and Affirmative Defenses in response to Nona Tobin, an individual and Trustee of the Gordon B. Hansen Trust's Cross-Claims (collectively "Tobin") as follows:

CROSSCLAIM

I.

PARTIES

1. As to paragraphs 1, 3, 4, 5, 6, 7, 8, and 9, Answering Cross-Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and denies same.

2. As to paragraph 2, Answering Cross-Defendant admits it is a Nevada Non-profit Corporation and that it is currently self-managed and denies the remainder of the paragraph.

II.

VENUE AND JURISDICTION

3. As to paragraphs 10 Answering Cross-Defendant admits the allegations therein.

4. As to paragraphs 11, and 18, Answering Cross-Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and denies same.

5. As to paragraph 12, 13, 14, 15, 16, and 17, Answering Cross-Defendant denies the allegations contained in therein because the allegations contain legal conclusions, to which no response is required.

II.

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STATEMENT OF FACTS

6. As to paragraph 19, Answering Cross-Defendant re-alleges, by reference, the proceeding paragraphs as though fully set forth herein.

7. As to paragraph 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, and 49, Answering Cross-Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and denies same.

8. As to paragraph 50, 51, 52, 53, 54, 55, and 56, Answering Cross-Defendant denies the allegations contained in therein because the allegations contain legal conclusions, to which no response is required.

FIRST CAUSE OF ACTION

QUIET TITLE AND EQUITABLE RELIEF

THE HOA SALE IS VOID AS IT WAS STATUTORILY NON-COMPLIANT

9. As to paragraph 57, Answering Cross-Defendant re-alleges, by reference, the proceeding paragraphs as though fully set forth herein.

10. As to paragraph 58, 59, 60, 61, 62, 63, 64, and 65, Answering Cross-Defendant denies the allegations contained therein because the allegations contain legal conclusions, to which no response is required.

11. As to paragraph 66, Answering Cross-Defendant re-alleges, by reference, the proceeding paragraphs as though fully set forth herein.

12. As to paragraph 67, 68, 72, 74, 63(2)[1], 64(2), 67(2), 68(2), 73(2) Answering Cross-Defendant denies the allegations contained in therein because the allegations contain legal conclusions, to which no response is required.

13. As to paragraph 69, 70, 73, 70(2), 71(2), 72(2), 74(2), 75, 76, and 77, Answering Cross-Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and denies same.

[1] After paragraph 74 numbering restarts at 63 which we have number 63(2), 64(2), etc.

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14. As to paragraph 71, Answering Cross-Defendant denies the same.

15. As to paragraph 65(2), and 66(2), Answering Defendant denies the same as they are citations/quotes to which no response is required.

ALL REMAINING CLAIMS

16. All remaining claims have been dismissed and Answering Cross-Defendant denies remaining paragraphs 78 -108, as no response is required.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

Tobin fails to state a claim upon which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

Tobin is barred by the doctrine of laches, estoppel, waiver, unjust enrichment and unclean hands.

THIRD AFFIRMATIVE DEFENSE

Tobin is barred from asserting any claims against Answering Cross-Defendant HOA because the alleged damages, if any, were the result of intervening, superseding conduct of others, over whom the Answering Defendant HOA has no control.

FOURTH AFFIRMATIVE DEFENSE

Tobin failed to mitigate damages, if any.

FIFTH AFFIRMATIVE DEFENSE

Tobin's claims are barred by contributory and comparative negligence.

SIXTH AFFIRMATIVE DEFENSE

Tobin's claims are reduced, modified and/or barred by the doctrine of collateral estoppel.

SEVENTH AFFIRMATIVE DEFENSE

Tobin failed to join one or more indispensable parties.

EIGHTH AFFIRMATIVE DEFENSE

The HOA owed no duty to Tobin and/or breached no duty to Tobin.

NINTH AFFIRMATIVE DEFENSE

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The non-judicial foreclosure sale of the HOA lien complies with all the applicable statutes.

TENTH AFFIRMATIVE DEFENSE

Tobin's claims are barred by the applicable statute or statutes of limitation and laches.

ELEVENTH AFFIRMATIVE DEFENSE

It has been necessary for the Answering Cross-Defendant to employ the service of an attorney to defend this action and a reasonable sum should be allowed for attorney's fees, together with the associated costs incurred in this action.

TWELFTH AFFIRMATIVE DEFENSE

Tobin's Claims are an abuse of process and the Answering Cross-Defendant reserves the right to file counterclaims or separate complaint for abuse of process to recover damages.

THIRTEENTH AFFIRMATIVE DEFENSE

The Answering Cross-Defendant is not the proximate or legal cause of Tobin's damages, if any.

FOURTEENTH AFFIRMATIVE DEFENSE

Answering Cross-Defendant reserves the right to amend or otherwise modify this Answer to assert additional affirmative defenses as they become known through formal or informal discovery.

FIFTEENTH AFFIRMATIVE DEFENSE

Answering Cross-Defendant has no contractual relationship to Tobin to give rise to indemnification.

SIXTEENTH AFFIRMATIVE DEFENSE

Foreclosure Purchaser, Nationstar, and Tobin assumed the risk of the HOA foreclosure market and Tobin is not entitled to relief against the HOA.

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SEVENTEENTH AFFIRMATIVE DEFENSE

The Foreclosure Deed is conclusive evidence of the HOA abiding by Chapter 116 recitals.

EIGHTEENTH AFFIRMATIVE DEFENSE

The final price of an HOA non-judicial foreclosure sale is insufficient to set aside a foreclosure sale absent a showing of fraud, unfairness or oppression.

NINETEENTH AFFIRMATIVE DEFENSE

Tobin failed to attend mediation as required by NRS § 38.310 and thus the Court lacks subject matter jurisdiction.

TWENTIETH AFFIRMATIVE DEFENSE

The HOA abided by NRS Chapter 116's requirements for the distribution of funds from the HOA non-judicial foreclosure sale.

TWENTY-FIRST AFFIRMATIVE DEFENSE

The HOA's lien was perfected at the recording of its CC&Rs and thus the entire lien is superior to any recorded deed of trust.

TWENTY-SECOND AFFIRMATIVE DEFENSE

The HOA had the right to foreclose on its entire lien pursuant to Nevada law.

TWENTY-THIRD AFFIRMATIVE DEFENSE

Chapter 116 is facially constitutional.

TWENTY-FOURTH AFFIRMATIVE DEFENSE

Chapter 116 is severable and constitutional.

TWENTY-FIFTH AFFIRMATIVE DEFENSE

Chapter 116 as applied in this foreclosure was constitutional.

TWENTY-SIXTH AFFIRMATIVE DEFENSE

Nationstar or it predecessor failed to tender a correct amount.

TWENTY-SEVENTH AFFIRMATIVE DEFENSE

Nationstar or its predecessor alleged tender was conditional.

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TWENTY-EIGHTH AFFIRMATIVE DEFENSE

Nationstar or its predecessor failed to publicly record the alleged tender.

DATED this 20th day of April, 2018.

LIPSON NEILSON P.C.

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of April, 2018, service of the foregoing **CROSS-DEFENDANT SUN CITY ANTHEM COMMUNITY ASSOCIATION'S ANSWER TO CROSS-CLAIMS BY NONA TOBIN, AN INDIVUDUAL AND TRUSTEE OF THE GORDON B. HANSEN TRUST** was made by electronic submission and filing of the foregoing with the Clerk of the Court by using the ECF system which served the following parties electronically:

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Attorney for Nona Tobin an individual and Trustee of the Gordon B. Hansen Trust, dated 8/22/25

Ashley Scott

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DISTRICT COURT

CLARK COUNTY, NEVADA

JOEL STOKES and SANDRA F. STOKES, as trustees of the JIMIJACK IRREVOCABLE TRUST, Plaintiff, vs. BANK OF AMERICA, N.A.; SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC.; DOES I through X and ROE BUSINESSENTITIES I through X, inclusive, Defendants.	CASE NO.: A-15-720032-C Dept. XXXI **CROSS-DEFENDANT SUN CITY ANTHEM COMMUNITY ASSOCIATION'S MOTION FOR SUMMARY JUDGMENT**
NATIONSTAR MORTGAGE, LLC Counter-Claimant, vs. JIMIJACK IRREVOCABLE TRUST; OPPORTUNITY HOMES, LLC, a Nevada limited liability company; F. BONDURANT, LLC, a Nevada limited liability company; DOES I through X, inclusive; and ROE CORPORATIONS XI through XX, inclusive, Counter-Defendants.	
NONA TOBIN, an individual, and Trustee of the GORDON B. HANSEN TRUST.	

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Dated 8/22/08

Counter-Claimant,

vs.

JOEL A. STOKES and SANDRA F. STOKES, as trustees of the JIMIJACK IRREVOCABLE TRUST,

Counter-Defendants.

NONA TOBIN, an individual, and Trustee of the GORDON B. HANSEN TRUST. Dated 8/22/08

Cross-Claimant,

vs.

SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC., DOES 1-10, AND ROE CORPORATIONS 1-10, inclusive,

Counter-Defendants.

NONA TOBIN, an individual, and Trustee of the GORDON B. HANSEN TRUST. Dated 8/22/08

Cross-Claimant,

vs.

OPPORTUNITY HOMES, LLC, THOMAS LUCAS, Manager,

Counter-Defendant.

NONA TOBIN, an individual, and Trustee of the GORDON B. HANSEN TRUST. Dated 8/22/08

Cross-Claimant,

vs.

YUEN K. LEE, an Individual, d/b/a Manager, F. BONDURANT, LLC,

Counter-Defendant.

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Cross-Defendant SUN CITY ANTHEM COMMUNITY ASSOCIATION (hereafter "HOA") by and through its counsel of record LIPSON NEILSON P.C., hereby submits its Motion for Summary Judgement as to claims by Nona Tobin, as Trustee of the Gordon B. Hansen Trust ("Tobin").

This Motion is based upon the Memorandum of Points and Authorities, the exhibits attached hereto, the pleadings and papers on file, and any oral argument that may be presented in this matter.

Dated this 5th day of February, 2019.

LIPSON NEILSON P.C.

/s/ DAVID T. OCHOA

BY: _____

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NOTICE OF MOTION

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD:

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that counsel for Sun City Anthem Community Association, will bring the foregoing Motion for Summary Judgment on for hearing before the above-entitled Court, on the **12** day of **March**, 2019, at the hour of **9:30**, a.m. in Department 31, of the Regional Justice Center, 200 Lewis Avenue, Las Vegas, Nevada, or as soon thereafter as counsel may be heard.

Dated this 5th day of February, 2019.

LIPSON NEILSON P.C.

/S/ DAVID T. OCHOA

BY: _____

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

By law, the foreclosure sale is presumed valid. Nona Tobin as Trustee of Gordon B. Hansen Trust ("Tobin") has the burden of overcoming the presumption. Tobin has one Cross-Claim against the HOA for Quiet Title/Declaratory Relief. Tobin takes the approach of everything went wrong to see if anything sticks with the Court. Review of Red Rock Financial Services LLC's ("Red Rock") foreclosure file indicates a number of factual inaccuracies in Tobin's Cross-Claim. The most glaring is that Tobin argues her last payment was made on time, even though the Red Rock file includes a letter from Tobin stating: here is my payment, "[u]nfortunately, I failed to mail the check in a timely fashion." The facts demonstrate that the July 2012 quarterly assessment was not paid until October 2012. By that time another quarterly assessment had gone

unpaid and other late fees and collection costs had begun to accumulate. Therefore, the delinquency that began in July 2012 was never paid down to a zero balance and continued until the date of the foreclosure sale. Sun City Anthem is entitled to summary judgment that the July 2012 payment was not timely paid and the foreclosure was properly noticed. Additionally, equitable principles bar Tobin relief for her claim in equity.

II. UNDISPUTED MATERIAL FACTS

In 2003, Gordon B. Hansen obtained a loan to purchased the real property located at 2763 White Sage Drive., Henderson, NV 89052 (the "Property'). See Cross-Claim ¶ 13.

The property was subject to the HOA's Covenants, Conditions and Restrictions "CC&Rs". See CC&Rs attached hereto as **Exhibit 1**.

In 2008, title to the property was transferred to the Gordon B. Hansen Trust (the "Trust"). Cross-Claim ¶ 16. Nona Tobin became the sole trustee of the Trust in January 2012 when Gordon Hansen passed away. Cross-Claim ¶ 17.

In 2012, the Trust defaulted on the homeowners' assessments. *See* Red Rock Financial Ledger attached hereto as **Exhibit 2**.

On September 17, 2012, Red Rock sent Gordon Hansen letters indicating that his account was in collections with them. See Letters attached hereto as **Exhibit 3**. The Letters that were sent to both addresses (Olivia Heights and White Sage) stated in bold:

> **A "30 Day Period" has been established for disputing the validity of the debt, or any portion thereof.**

Id.

On September 20, 2012, Sun City Anthem sent Gordon Hansen a Notice of Hearing that his account was delinquent and they were considering suspending membership privileges. *See* Sun City Anthem Notice of Hearing attached hereto as **Exhibit 4**.

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On October 3, 2012, Tobin sent a letter to Sun City Anthem informing Sun City Anthem that Gordon Hansen passed away ("Tobin Letter"). *See* Tobin Letter attached hereto as **Exhibit 5**.

The Tobin Letter included a copy of the Notice of Hearing sent by Sun City Anthem as it was stamped by Red Rock as received on October 8, 2012 with other parts of the letter. *Id*.

The Tobin Letter also stated she was late and delinquent on assessments, that she was attempting to short sale the Property, and she did not intend to pay any additional assessments after the enclosed check. *Id*.

Tobin in fact never paid assessments after the October 2012 Letter. *See* Ledger Exhibit 2.

The Tobin Letter stated:

> Enclosed please find:
> l, Certificate of death for Gordon B. Hansen, property owner, on 1/14/2012
> 2. Check for $300 HOA dues
>
> On 2/14/2012, I listed Mr. Hansen's property for short sale with the Proudfit Realty Company. I continued to pay the HOA dues owed on the property, and wrote the enclosed check on 8/17/2012. Unfortunately, I failed to mail the check in a timely fashion. Subsequently, an offer was placed on the property as a short sale, and it is my understanding that the buyers will be moving in within the next month.
>
> It is my request that the HOA pursue collection of any future HOA dues from the buyers within the escrow or from them directly once the sale is complete or however you normally handle cases in which the owner is deceased.
>
> Any questions, please contact Doug Proudfit[.]

(*See* Tobin Letter, Exhibit 5).

On November 5, 2012, Red Rock sent letters to both addresses (Olivia Heights and White Sage) addressed to The Estate of Gordon N. Hansen, informing that they received the notification that Gordon Hansen had passed, and requesting the Estate

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contact the office within thirty days of the letter. *See* November Letters, Ledger, and Payment Allocation attached hereto as **Exhibit 6**.

The Ledger and Payment Allocation indicate that payment was applied to July 1, 2012 Quarter Assessment and the July 31, 2012 Late Fee. *Id*.

On December 14, 2012, the HOA, through Red Rock Financial ('Red Rock") recorded a notice of delinquent assessment lien. Cross-Claim. ¶ 24, and *see* **Exhibit 7** attached hereto.

On March 12, 2013, the HOA, through Red Rock, recorded a notice of default and election to sell. *Id*. ¶ 26 and *see* **Exhibit 8** attached hereto. The first notice of default was rescinded on or about April 3, 2013. Cross-Claim. ¶ 27, and *see* **Exhibit 9** attached hereto.

On April 8, 2013, a second notice of default and election to sell was recorded by the HOA through Red Rock. Cross-Claim. ¶ 28, and *see* **Exhibit 10** attached hereto.

The second notice of default and election to sell correctly notes the start of the delinquency since July 1, 2012, stating:

> As of 07/01/2012 forward, all assessments, whether monthly or otherwise, late fees, interests, Association charges, legal fees and collection fees and costs, **less any credits**, have gone unpaid.

Second Notice of Default and Election to Sell (emphasis added) Exhibit 10.

The Red Rock Ledger indicates the July 1, 2012 assessment payment was late, this was put in the second notice of default and election to sell, and is confirmed by the Tobin Letter. *See* Exhibit 2, Exhibit 5, and Exhibit 10.

On February 12, 2014, the HOA, through Red Rock, recorded a notice of foreclosure sale. Cross-Claim. ¶ 30 and see **Exhibit 11** attached hereto.

The Notice of Sale correctly references the second notice of default and election to sell that was recorded on April 8, 2013. *See* Exhibit 10 and Exhibit 11.

Red Rock complied with all mailing requirements. See **Exhibit 12** attached hereto ("mailings"). Mailings went to both the Property address (White Sage) and Tobin's

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home address (Olivia Heights). *Id*. Tobin signed for some of the mailings herself. *Id*.

The sale was scheduled for March 7, 2014, in the Notice of Sale. *See* Exhibit 11. The sale was posted and published. See **Exhibit 13** attached hereto.

The sale was postponed three times. See **Exhibit 14** attached hereto, payoff demands and Communications with Craig Leidy, at bates SCA000274 and SCA000308. (add letter there are no postponements left).

The postponements were made in part to help Tobin attempt to short sale the property. See Exhibit 14 at bates SCA000274.

Tobin contracted with Craig Leidy to help her short sale the Property. Cross-Claim ¶ 32 and *See* Exhibit 14 at SCA000327.

Craig Leidy requested the HOA waive thousands of dollars off the debt. See Exhibit 14 at bates SCA000302, SCA000277, and SCA000276.

The HOA did communicate that it would waive some amounts but could not grant the waiver to the extent requested. *See* Exhibit 14 at bates SCA000276.

Communication between Nationstar and Craig Leidy appears to indicate the balance was too high for Nationstar to allow the short sale. *See* Exhibit 14 at bates SCA000302 and SCA000274.

Sometime in May 2014, The Estate of Gordon Hansen entered into a Purchase Agreement with MZK Residential LLC, contingent on short sale approval. See Short Sale Purchase Agreement attached hereto as **Exhibit 15**, and specifically see "Short Sale Approval at bates Tobin 000076. Tobin initialed every page of the agreement. *Id*.

The HOA foreclosure took place on August 15, 2014, whereby the HOA, through Red Rock, sold the Property to Thomas Lucas representing Opportunity Homes LLC for $63,100.00. See **Exhibit 16** attached hereto.

A foreclosure deed in favor of Opportunity Homes LLC was recorded on August 22, 2014. *See Id*.

On October 13, 2014, Tobin sent an email to Craig Leidy, where she indicates her belief that he failed to protect the Trust's interest, that she believed he was working with

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the Purchaser Thomas Lucas, and also that she is aware that Red Rock interplead the excess proceeds.[1] See **Exhibit 17** attached hereto.

On August 11, 2017, A Notice of Entry Order Granting Thomas Lucas and Opportunity Homes, LLC's Motion for Summary Judgment was filed in this case. See a copy attached hereto as **Exhibit 18**. The Order states:

> While it is true that Mr. Lucas is a real estate licensee and an independent agent working with BHHS, BHHS is a real estate company that employs more than 800 real estate agents in Las Vegas valley alone, and Mr. Lucas is not bound by the agreements that Tobin could have signed with other BHHS agents.

Id. at p. 5.

Tobin has filed one cause of action for Quiet Title/Declaratory Relief against the HOA.[2] The HOA now submits its Motion for Summary Judgment.

III. LEGAL STANDARD

Summary Judgment is appropriate "when the pleadings and other evidence on file demonstrate that no 'genuine issue to any material fact [remains] and that the moving party is entitled to a judgment as a matter of law.'" *Wood v. Safeway, Inc.*, 121 Nev. 724, 729, 121 P.3d 1026, 1029 (2005). Additionally, "[t]he purpose of summary judgment 'is to avoid a needless trial when an appropriate showing is made in advance that there is no genuine issue of fact to be tried, and the movant is entitled to judgment as a matter of law.'" *McDonald v. D.P. Alexander & Las Vegas Boulevard, LLC*, 121 Nev. 812, 815, 123 P.3d 748, 750 (2005) quoting *Coray v. Home*, 80 Nev. 39, 40-41, 389 P.2d 76, 77 (1964). Moreover, the non-moving party "must, by affidavit or otherwise, set forth specific facts demonstrating the existence of a genuine issue for trial or have summary judgment entered against [it]." Wood, 121 Nev. at 32, 121 P.3d at 1031. Though inferences are to be drawn in favor of the non-moving party, an opponent to summary judgment, must show that it can produce evidence at trial to

[1] See Cross-Claim ¶¶ 39 and 50 where Tobin alleges Red Rock failed to distribute proceeds.

[2] Tobin's Motion to Amend was granted, however, the Amendment which was an attached Exhibit to the Motion was never separately filed.

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support its claim or defense. *Van Cleave v. Kietz-Mill Minit Mart*, 97 Nev. 414, 417, 633 P.2d 1220, 222 (1981).

IV. LEGAL ARGUMENT

A. The HOA is Entitled to Summary Judgment on Tobin's Quiet Title/Declaratory Relief Claim as the Trust was Delinquent on Assessments and the HOA through Red Rock Foreclosed on the Delinquency.

Tobin argues that the Trust's interest in the property was not extinguished by the foreclosure sale. However, Tobin's Cross-Claim against the HOA is factually inaccurate as confirmed by review of Red Rock's foreclosure file. Tobin's argument asks the Court to court assume she paid on time but Red Rock did not apply the payment correctly, and then to conclude Red Rock foreclosed incorrectly. However, that is not what happened here, and it is Tobin's own words that confirm there was a delinquency that Red Rock began collecting on and eventually foreclosed on. On October 3, 2012, Tobin sent a letter to the HOA that was eventually stamped received by Red Rock on October 8, 2012. *See* Exhibit 5 and Exhibit 19. The Letter stated:

> Unfortunately, I failed to mail the check in a timely fashion. Subsequently, an offer was placed on the property as a short sale, and it is my understanding that the buyers will be moving in within the next month.
>
> It is my request that the HOA pursue collection of any future HOA dues from the buyers within the escrow or from them directly once the sale is complete or however you normally handle cases in which the owner is deceased. *Id*.

The information matched Red Rock's ledgers indicating the July 2012 assessment was not timely paid. *See* Exhibit 2. The record indicates that Tobin was notified throughout the foreclosure process, and continued to attempt to short sale the Property throughout the foreclosure process. *See* Exhibits 12 -14. Throughout those notifications and attempts to short sale, Tobin never communicated a belief to Red Rock that her payment in check 143 that accompanied the Tobin Letter was not timely applied.

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The Notices indicate that the delinquency began on July 1, 2012. For example, the second notice of default and election to sell correctly notes the start of the delinquency since July 1, 2012, stating:

> As of 07/01/2012 forward, all assessments, whether monthly or otherwise, late fees, interests, Association charges, legal fees and collection fees and costs, **less any credits**, have gone unpaid.

Tobin argues that "[the] notice incorrectly states that no payments of any kind have been made since July 1, 2012." Cross-Claim ¶ 28. Tobin also repeats this argument for the Foreclosure Deed, arguing that the statement is indicating no payments since that date. Cross-Claim ¶ 37. This argument is factually incorrect and a misreading of the above cited statement from the Notices. The statement is indicating the start date of the delinquency and the fact that the delinquency has never been completely satisfied (meaning reached a zero balance). This is true because of the inclusion of the language "less any credits." The statement is stating all the amounts that make up the delinquency less and credits has not been brought to a zero balance.

Tobin also argues that the July date is incorrect, because July assessments should have been paid and the account should have received a zero balance at that time. Cross-Claim ¶ 22. However, this argument is based on the assumption that Tobin paid timely, which again is contradicted by the Tobin Letter. Exhibit 5. The Letter aligns with the Red Rock ledger to demonstrate the payment was not received until October. *See* Exhibit 2. Therefore, the statement in the notices that the delinquency beginning in July 2012 never reached a zero balance is accurate and confirmed by the ledgers.

Tobin also falsely claims that "[the] Notice of Sale incorrectly referenced the First Notice of Default, which had been cancelled." Cross-Claim ¶ 33. This is false. The HOA, on March 12, 2013, through Red Rock, did record a notice of default and election to sell. Exhibit 8. Red Rock did have the first notice of default rescinded on or about April 3, 2013. Exhibit 9. However, Red Rock recorded, a second notice of default and election to sell on April 8, 2013. Exhibit 10. attached hereto. The Notice of Foreclosure

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Sale recorded on February 12, 2014, references the second notice of default and election to sell that was recorded on April 8, 2013. *See* Exhibit 11.

Therefore, the HOA through Red Rock did not wrongfully foreclose which is the underlining assertion of the Tobin claim. The claim is ripe for summary judgment as Tobin will not be able to overcome the weight of her previous statement. Tobin's previous statement taken as true indicates there is no disputed material fact that the delinquency was properly accounted for and foreclosed on. A party cannot defeat summary judgment by contradicting itself. See *Aldabe v. Adams,* 81 Nev. 280, 284–85, 402 P.2d 34, 36–37 (1965) (refusing to credit sworn statement made in opposition to summary judgment that was in direct conflict with an earlier statement of the same party). Tobin or her agent were in communication with Red Rock throughout the foreclosure process and never raise the belief that the payment was applied incorrectly and the late fee waiver was approved anyway. *See* Exhibits 12 – 14.

Accordingly, the HOA is entitled to Summary Judgment on the Quiet Title/Declaratory Relief claim.

B. Alternatively, Even If the Court Cannot Decide Which Tobin to Believe at this Time, the HOA is Still Entitled to Summary Judgment Because the Claim in Equity Favors the HOA.

The HOA argued above that the Tobin Cross-Claim contains false factual allegations that are easily contradicted by the Red Rock Foreclosure File[3]; and therefore, the Court can grant summary judgment against the argument that the payment was not timely applied.

Yet, additionally, Tobin's claim is based on a false premise, that an accounting error would entitle the Trust to equitable relief, even though the Trust did not attempt to pay the total delinquency.

Even assuming in the alternative that a payment was timely made and misapplied, equity would still weigh in favor of the HOA given the totality of the situation.

[3] Key portions of the Foreclosure File are attached as various exhibits.

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Tobin would not have been prejudiced by an error if one had occurred, as under the facts here Tobin never attempted to pay the delinquency even though it was outstanding for about two years, and the sale was postponed multiple times. Tobin never addressed the timing of the payment with Red Rock. It is undisputed that years of assessments went unpaid after that check. If Tobin had raised the issue at the time, Red Rock could have re-noticed the delinquency and restarted the process.

For the following reasons even if the Court assumes in Tobin's favor that the payment was timely made, Equity weighs in favor of the HOA given the other facts surrounding the sale.

1. Review Under *Shadow Wood* Provides Tobin is Not Entitled to Equity and Summary Judgment Should be Granted in Favor of the HOA.

"When sitting in equity, [], courts must consider the entirety of the circumstances that bear upon the equities." *Shadow Wood HOA v. N.Y. Cmty. Bancorp.*, 132 Nev. Adv. Op. 5, 366 P.3d 1105, 1114 (2016), referencing: see *e.g., In re Petition of Nelson,* 495 N.W.2d 200, 203 (Minn.1993). Here, there is no factual universe where the Tobin Letter does not exist, and at best, Tobin is arguing that she is correct now and the letter was a mistake. However, the record is clear that Tobin never took action to argue a payment was misapplied prior to the sale. Tobin's own actions must be considered by the Court.

> Against these inconsistencies, however, must be weighed NYCB's (in)actions. The NOS was recorded on January 27, 2012, and the sale did not occur until February 22, 2012. NYCB knew the sale had been scheduled and that it disputed the lien amount, yet it did not attend the sale, request arbitration to determine the amount owed, or seek to enjoin the sale pending judicial determination of the amount owed. The NOS included a warning as required by NRS 116.311635(3)(b):
>
> WARNING! A SALE OF YOUR PROPERTY IS IMMINENT! UNLESS YOU PAY THE AMOUNT SPECIFIED IN THIS NOTICE BEFORE THE SALE DATE, YOU COULD LOSE YOUR HOME, *EVEN IF THE AMOUNT IS IN DISPUTE.* YOU MUST ACT BEFORE THE SALE DATE.

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Shadow Wood HOA v. N.Y. Cmty. Bancorp., 132 Nev. Adv. Op. 5, 366 P.3d 1105, 1114 (2016). Similar to NYCB in *Shadow Wood*, Tobin is arguing she disputed the lien amount. Yet, similar to NYCB Tobin did not do any of things the *Shadow Wood* Court references such as attend the sale, request arbitration on the amount, or seek to enjoin the sale. Without taking those actions and the more obvious actions of just communicating it to Red Rock, the court should not believe Tobin was prejudiced by an accounting error that was a small part in a total amount Tobin was not going to pay anyway.

The interaction between Craig Leidy and Red Rock is telling. Tobin contracted with Craig Leidy to help her short sale the Property. Cross-Claim ¶ 32 and *See* Exhibit 14 and Exhibit 15. Craig Leidy requested the HOA waive thousands of dollars off the debt. Exhibit 14. If Tobin actually believed that payments were misapplied and it led to additional charges that discussion would have come up during the waiver of debt. The HOA did communicate that it would waive some amounts but could not grant the waiver to the extent requested. Exhibit 14. Factually, all late fees and interest amounts were going to be waived if Tobin could accomplish the short sale of the Property. *Id*. Communication between Nationstar and Craig Leidy appears to indicate the balance was too high for Nationstar to allow the short sale. *Id*. However, it was not any late fees or interest that prevented the short sale. *Id*.

"[I]t is well established that due process is not offended by requiring a person with actual, timely knowledge of an event … to exercise due diligence and take necessary steps to preserve [his] rights." In re Medaglia, 52 F.3d at 455; see also *SFR Investments Pool 1 v. U.S. Bank*, 130 Nev. Adv. Op. 75, 334 P.3d 408, 418 (2014). Here, if Tobin knew of an error, she failed to diligently act to correct the error. There is nothing in Tobin's Claim or actions that would lead to setting aside the sale in equity.

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2. Tobin Is Estopped from Seeking Equitable Relief.

"Equitable estoppel functions to prevent the assertion of legal rights that in equity and good conscience should not be available due to a party's conduct." *In re Harrison Living Tr.,* 121 Nev. 217, 223, 112 P.3d 1058, 1061–62 (2005).

> This court has previously established the four elements of equitable estoppel: (1) the party to be estopped must be apprised of the true facts; (2) he must intend that his conduct shall be acted upon, or must so act that the party asserting estoppel has the right to believe it was so intended; (3) the party asserting the estoppel must be ignorant of the true state of facts; (4) he must have relied to his detriment on the conduct of the party to be estopped.

Id. Here, with the Tobin Letter the Court should find that Tobin is now Estopped from arguing the payment was timely and misapplied. Taking the factors out of order, to the second factor, Tobin must have intended the Letter be acted upon, as it makes specific requests. Exhibit 5. To the third factor, the HOA and Red Rock, clearly believed the payment was untimely, as indicated by their Ledgers. Exhibit 2. They could have filed a new delinquency if they believed there was an accounting error, and it does not make any sense for them to proceed with the accounting error if it only led to additional late fees that the HOA was willing to waive anyway. Exhibit 14. To the fourth factor, Red Rock's file contained the Tobin Letter. Exhibit 5. The Red Rock file also included a Progress Report that establishes on October 8, 2012 they received the "correspondence via mail." **Exhibit 19** attached hereto. The Progress Report indicates Red Rock processed the payment on October 18, 2012. *Id*. Red Rock relied on the letter to process the payment included with it, and nothing in the letter dated October 3, 2012 made Red Rock believe the payment should not be applied in October. To the first factor, if Tobin never knew of an accounting error before the sale, she was never harmed because she never intended or attempted to pay the delinquency. The only

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way Tobin could have been harmed is if she was aware of the error, and attempted to correct it during the sale and was unable to. The facts do not demonstrate this, and it is more likely the payment was untimely. However as this is the only way Tobin might be entitled to equity, with knowledge that the payment was misapplied; the Court should assume for the first factor that Tobin was apprised of the true facts.

Therefore, considering the factors together the Court should conclude that Tobin was aware or became aware of a mistake in the letter, that she intended Red Rock to rely on the letter, that Red Rock was not aware that the payment should not be applied in October, and Red Rock did rely on the letter to apply the payment in October. Therefore, the Court should conclude with the Tobin Letter that Tobin is now estopped from arguing the payment was timely.

3. Tobin's Claim in Equity is Barred by the Doctrine of Unclean Hands.

"It is a well-known maxim that a person who comes into an equity court must come with clean hands." *Income Inv'rs v. Shelton*, 3 Wash. 2d 599, 602, 101 P.2d 973, 974 (1940). "The doctrine bars relief to a party who has engaged in improper conduct in the matter in which that party is seeking relief. As such, the alleged inequitable conduct relied upon must be connected with the matter in litigation . . ." *Truck Ins. Exch. v. Palmer J. Swanson, Inc.*, 124 Nev. 629, 637–38, 189 P.3d 656, 662 (2008).

Here, Tobin is asking to set aside a foreclosure on delinquency that totaled thousands of dollars because she argues if a payment was applied differently there would be less late fee charges or the delinquency start date may be different. There is also the Tobin Letter where she agrees she "failed to mail the check in a timely fashion." Exhibit 5. If the Tobin Letter was a mistake, there should be an additional communication by Tobin that states such. Without a subsequent communication after the Tobin Letter, Tobin was complicit in creating the issue she now alleges, as it was a correctable issue for which Red Rock could have released and recorded new

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documents. It is undisputed that subsequent assessments went unpaid. Tobin received the notices that stated the delinquency began in July of 2012. *See* Exhibit 12. If it was a mistake, Tobin allowed Red Rock to believe it, and Tobin's inequitable conduct is directly related to the allegations now.

> In determining whether a party's connection with an action is sufficiently offensive to bar equitable relief, two factors must be considered: (1) the egregiousness of the misconduct at issue, and (2) the seriousness of the harm caused by the misconduct.[7] Only when these factors weigh against granting the requested equitable relief will the unclean hands doctrine bar that remedy.[8] The district court has broad discretion in applying these factors, and we will not overturn the district court's determination unless it is unsupported by substantial evidence.

Las Vegas Fetish & Fantasy Halloween Ball, Inc. v. Ahern Rentals, Inc., 124 Nev. 272, 276, 182 P.3d 764, 767 (2008). To the First Factor of the egregiousness of the misconduct, the misconduct is not just the Tobin Letter that makes Red Rock believe the check was not mailed in a timely fashion, but the inaction to correct the alleged mistake later. The HOA essentially agreed to waive the late fees and interest to help accomplish a short sale. For Tobin she was no longer prejudiced if the late fees were actually inaccurate, they were not going to prevent her short sale. The only reason not to communicate the issue and correct her prior letter, would be to create an issue to challenge the foreclosure later. The Court should find Tobin's action or inaction sufficiently egregious if she believed there was an error and did not communicate it. To the Second Factor of the seriousness of the harm, the court should find that creating a cloud on title to property is sufficiently serious harm.

The Nevada Supreme Court in *Las Vegas Fetish & Fantasy Halloween Ball, Inc. v. Ahern Rentals, Inc.* cited to *Income Inv'rs v. Shelton*, 3 Wash. 2d 599, 602, 101 P.2d 973, 974–75 (1940), for its position on denying equity to a party with unclean hands. The Income Inv'rs Court stated:

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> Equity will not interfere on behalf of a party whose conduct in connection with the subject-matter or transaction in litigation has been unconscientious, unjust, or marked by the want of good faith, and will not afford him any remedy. 1 Pomeroy's Equity Jurisprudence (4th ed.) 739, § 398; Dale v. Jennings, 90 Fla. 234, 107 So. 175; Bearman v. Dux Oil & Gas Co., 64 Okl. 147, 166 P. 199; Deweese v. Reinhard, 165 U.S. 386, 17 S.Ct. 340, 41 L.Ed. 757. Other authorities might be cited, but the rule appears to be universal.
>
> If the parties were guilty of the conduct which the trial court found that they were, the appellant comes squarely within the rule that equity will deny it relief, because coming into a court of equity and asking relief after wilfully concealing, withholding, and falsifying books and records, is certainly not coming in with clean hands.

Income Inv'rs v. Shelton, at 974–75. The case demonstrates that concealing, or withholding an issue can be unclean hands. Again, if the issue was raised it could have been corrected. Based on the foregoing the Court should find Tobin's claim is barred by doctrine of unclean hands.

Again, these arguments are lodged in the alternative. The Court should grant Summary Judgment that the payment was untimely as it is the logical conclusion give the facts. However, even assuming it was timely, there is no path to equity for Tobin given the Tobin Letter and no subsequent communication that the letter was a mistake, as these options range from Tobin being indifferent to correcting the issue to misleading Red Rock.

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V. CONCLUSION

Based on the foregoing arguments, the HOA respectfully requests that its Motion for Summary Judgment be granted.

Dated this 5th day of February, 2019.

LIPSON NEILSON P.C.

/S/ DAVID T. OCHOA

BY: _____

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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of February, 2019, service of the foregoing **CROSS-DEFENDANT SUN CITY ANTHEM COMMUNITY ASSOCIATION'S MOTION FOR SUMMARY JUDGMENT** was made by electronic submission and filing of the foregoing with the Clerk of the Court by using the ECF system which served the following parties electronically:

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Attorney for Nona Tobin an individual and Trustee of the Gordon B. Hansen Trust, dated 8/22/25

/s/ Ashley Scott-Johnson

An Employee of LIPSON NEILSON, P.C.

EXHIBIT 1

When Recorded Return To:

John E. Leach, Esq.
Leach Johnson Song & Gruchow
5495 S. Rainbow Blvd., Suite 202
Las Vegas, Nevada 89118

APN Nos: 190-05-110-001

(continued on next page)

Receipt/Conformed Copy
Requestor:
LEACH JOHNSON ETAL
05/20/2008 16:38:20 T20080094151
Book/Instr: 20080520-0004342
Restrictio Page Count: 116
Fees: $129.00 N/C Fee: $0.00

Debbie Conway
Clark County Recorder

SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

THIRD
AMENDED AND RESTATED
DECLARATION OF COVENANTS, CONDITIONS AND RESTRICTIONS
FOR
SUN CITY ANTHEM

THIRD

AMENDED AND RESTATED

DECLARATION OF COVENANTS, CONDITIONS, AND RESTRICTIONS

FOR

SUN CITY ANTHEM

This THIRD AMENDED & RESTATED DECLARATION OF COVENANTS, CONDITIONS AND RESTRICTIONS FOR SUN CITY ANTHEM (the "Second Amended and Restated Declaration") is made this _____ day of May, 2008, by Sun City Anthem Community Association, Inc. (the "Association").

RECITALS

WHEREAS, on June 17, 1998, Del Webb Communities, Inc., an Arizona corporation, ("Declarant") formed Sun City Anthem Community Association, Inc., a Nevada nonprofit corporation by filing the Articles of Incorporation in the Office of the Nevada Secretary of State;

WHEREAS, on June 29, 1998, Declarant recorded the Declaration of Covenants, Conditions and Restrictions for Sun City Anthem in the Office of the County Recorder, Clark County, Nevada, in Book No. 980629, as Instrument No. 00719 (the "Declaration");

WHEREAS, the 1999 Nevada Legislature adopted Senate Bill ("SB") 451, which became effective on October 1, 1999, and which made certain changes to the Unified Common-Interest Ownership Act, codified as Nevada Revised Statutes Chapter 116 (the "Act");

WHEREAS, the Association adopted the Amended and Restated Declaration of Covenants, Conditions and Restrictions for Sun City Anthem (the "First Amended and Restated Declaration") in order to bring the Declaration into conformance with SB 451. The First Amended and Restated Declaration was recorded on October 31, 2000, in the Office of the County Recorder, Clark County, Nevada, in Book No. 20001031, as Instrument No. 02253;

WHEREAS, the 2003 Nevada Legislature adopted SB 100, which became effective on October 1, 2003, and which made additional changes to the Act;

WHEREAS, the Association adopted the First Amendment to the Amended and Restated Declaration of Covenants, Conditions and Restrictions for Sun City Anthem (the "First Amendment") in order to bring the First Amended and Restated Declaration into conformance with SB 100. The First Amendment was recorded on April 16, 2004, in the Office of the County Recorder, Clark County, Nevada, in Book No. 20040416, as Instrument No. 0003069;

WHEREAS, the Association adopted the Second Amendment to the Amended and Restated Declaration of Covenants, Conditions and Restrictions for Sun City Anthem (the "Second Amendment") in order to adopt an Asset Enhancement Fee and to clarify the age restriction provision of the Declaration. The Second Amendment was recorded on April 19, 2004, in the Office of the County Recorder, Clark County, Nevada, in Book No. 20040419, as Instrument No. 0003196;

WHEREAS, the 2005 Nevada Legislature adopted SB 325, which became effective on October 1, 2005, and which made additional changes to the Act;

WHEREAS, the Act authorized the Board to amend the First Amended and Restated Declaration if any provision contained therein does not conform to the Act, and authorizes the Board to make such amendments without complying with the procedural requirements generally applicable to the amendment of governing documents;

WHEREAS, on April 16, 2008, the Board of Directors caused the Second Amended and Restated Declaration of Covenants, Conditions and Restrictions for Sun City Anthem (the "Second Amended and Restated Declaration") to be recorded in the Office of the County Recorder, Clark County, Nevada, in Book No. 20080416, as Instrument No. 0001189, for the purpose of consolidating the First Amended and Restated Declaration and the amendments thereto into a single document and to bring the First Amended and Restated Declaration into compliance with the Act;

WHEREAS, after recordation of the Second Amended and Restated Declaration, it was discovered that portions of the First Amendment and Second Amendment had been unintentionally omitted from the Second Amended and Restated Declaration;

NOW, THEREFORE, the Second Amended and Restated Declaration is hereby amended and restated in its entirety as follows:

PART ONE: INTRODUCTION TO THE COMMUNITY

Del Webb Communities, Inc., as developer of Sun City Anthem, has established this Declaration to provide a governance structure and a flexible system of standards and procedures for the overall development, administration, maintenance, and preservation of Sun City Anthem as a master planned community.

ARTICLE I
CREATION OF THE COMMUNITY

1.1. Purpose and Intent.

Declarant, as owner of the real property described in Exhibit "A," intends by Recording this Declaration to create a general plan of development for the planned community known as Sun City Anthem. This Declaration provides a flexible and reasonable procedure for the future expansion of Sun City Anthem to include additional real property as Declarant deems appropriate and provides for the overall development, administration, maintenance, and preservation of the real property now and hereafter comprising Sun City Anthem. An integral part of the development plan is the creation of Sun City Anthem Community Association, Inc., an association comprised of all owners of real property in Sun City Anthem, to own, operate, and maintain various common areas and community improvements, and to administer and enforce this Declaration and the other Governing Documents referred in this Declaration.

This document is prepared pursuant to the Nevada Common Interest Ownership Act. NRS 116.1101, *et seq.*, and establishes a planned community as defined therein.

1.2. Binding Effect.

All property described in Exhibit "A" and any additional property which is made a part of Sun City Anthem in the future by Recording one or more Supplemental Declarations, shall be owned, conveyed, and used subject to all of the provisions of this Declaration, which shall run with the title to such property. This Declaration shall be binding upon all Persons having any right, title, or interest in any portion of the Properties, heir, heirs, successors, successors-in-title, and assigns.

EXHIBIT 2

RRFS
RED ROCK FINANCIAL SERVICES

Red Rock Financial Services

Opening Bid $5817.68

Account Detail

Information as of: August 15, 2014

Sun City Anthem Community Association

Red Rock Financial Service Account Number: 808634

Property Address: 2763 White Sage Dr, Henderson, NV 89052

Homeowner(s): The Gordon B. Hansen Trust, dated August 22, 2008;The Gordon B. Hansen Trust, dated August 22, 2008;SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC. ;WESTERN THRIFT & LOAN;MERS ;BANK OF AMERICA, N.A. ;WELLS FARGO BANK, N.A. ;State of Nevada Ombudsman for Common-Interest Communities;REPUBLIC SERVICES

Date	Description	Amount	Balance	Pmt Ref #	Memo
1/1/2006	Quarterly Assessment	$235.00	$235.00		Conversion
2/1/2006	Association Mgmt Payment	($235.00)	$0.00		Conversion
4/1/2006	Quarterly Assessment	$235.00	$235.00		Billing
4/18/2006	Association Mgmt Payment	($235.00)	$0.00		Batch Adjustment
7/1/2006	Quarterly Assessment	$235.00	$235.00		Billing
7/12/2006	Association Mgmt Payment	($235.00)	$0.00		Batch Adjustment
10/1/2006	Quarterly Assessment	$235.00	$235.00		Billing
10/26/2006	Association Mgmt Payment	($235.00)	$0.00		Batch Adjustment
1/1/2007	Quarterly Assessment	$235.00	$235.00		Billing
1/11/2007	Association Mgmt Payment	($235.00)	$0.00		Batch Adjustment
3/8/2007	Association Mgmt Payment	($235.00)	($235.00)		Batch Adjustment
4/1/2007	Quarterly Assessment	$235.00	$0.00		Billing
6/8/2007	Association Mgmt Payment	($235.00)	($235.00)		Batch Adjustment
7/1/2007	Quarterly Assessment	$235.00	$0.00		Billing
10/1/2007	Sun City Anthem QT Assmt	$235.00	$235.00		Sun City Anthem Quarterly Assessment
10/11/2007	Association Mgmt Payment	($235.00)	$0.00	1873	Receipt Processing
1/1/2008	Sun City Anthem QT Assmt	$275.00	$275.00		Sun City Anthem Quarterly Assessment
1/11/2008	Association Mgmt Payment	($275.00)	$0.00	6761	Receipt Processing
3/1/2008	Special Assessment	($81.32)	($81.32)		Reverse Fence Painting
3/1/2008	Special Assessment	$81.32	$0.00		Fence Painting
4/1/2008	Sun City Anthem QT Assmt	$275.00	$275.00		Sun City Anthem QT Assmt
4/8/2008	Association Mgmt Payment	($275.00)	$0.00	3313	Receipt Processing
6/1/2008	Unit Repair	$81.32	$81.32		Fence Painting
6/25/2008	Association Mgmt Payment	($81.32)	$0.00	2044	Receipt Processing

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RRFS
RED ROCK FINANCIAL SERVICES

Red Rock Financial Services

Account Detail

Information as of: August 15, 2014

Sun City Anthem Community Association

Red Rock Financial Service Account Number: 808634

Property Address: 2763 White Sage Dr, Henderson, NV 89052

Homeowner(s): The Gordon B. Hansen Trust, dated August 22, 2008;The Gordon B. Hansen Trust, dated August 22, 2008;SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC. ;WESTERN THRIFT & LOAN;MERS ;BANK OF AMERICA, N.A. ;WELLS FARGO BANK, N.A. ;State of Nevada Ombudsman for Common-Interest Communities;REPUBLIC SERVICES

7/1/2008	Sun City Anthem QT Assmt	$275.00	$275.00		Sun City Anthem QT Assmt
7/11/2008	Association Mgmt Payment	($275.00)	$0.00	6578	Receipt Processing
9/25/2008	Association Mgmt Payment	($175.00)	($175.00)	02057	Lockbox Payment
10/1/2008	Sun City Anthem QT Assmt	$175.00	$0.00		Sun City Anthem QT Assmt
12/31/2008	Association Mgmt Payment	($240.00)	($240.00)	02074	Lockbox Payment
1/1/2009	Sun City Anthem QT Assmt	$240.00	$0.00		Sun City Anthem QT Assmt
4/1/2009	Sun City Anthem QT Assmt	$240.00	$240.00		Sun City Anthem QT Assmt
4/7/2009	Association Mgmt Payment	($240.00)	$0.00	02090	Lockbox Payment
7/1/2009	Sun City Anthem QT Assmt	$240.00	$240.00		Sun City Anthem QT Assmt
7/13/2009	Association Mgmt Payment	($240.00)	$0.00	23791	Lockbox Payment
10/9/2009	Association Mgmt Payment	($240.00)	($240.00)	97004	Lockbox Payment
1/1/2010	Sun City Anthem QT Assmt	$240.00	$0.00		Sun City Anthem QT Assmt
1/25/2010	Association Mgmt Payment	($240.00)	($240.00)	10803	Lockbox Payment
4/1/2010	Sun City Anthem QT Assmt	$240.00	$0.00		Sun City Anthem QT Assmt
7/1/2010	Sun City Anthem QT Assmt	$240.00	$240.00		Sun City Anthem QT Assmt
7/30/2010	Late Fees	$25.00	$265.00		Late Fees
8/16/2010	Association Mgmt Payment	($265.00)	$0.00	63164	Lockbox Payment
10/7/2010	Association Mgmt Payment	($240.00)	($240.00)	98965	Lockbox Payment
1/1/2011	Sun City Anthem QT Assmt	$250.00	$10.00		Sun City Anthem QT Assmt
2/18/2011	Association Mgmt Payment	($10.00)	$0.00	84899	Lockbox Payment
4/1/2011	Sun City Anthem QT Assmt	$250.00	$250.00		Sun City Anthem QT Assmt
4/30/2011	Late Fees	$25.00	$275.00		Late Fees
5/20/2011	Association Mgmt Payment	($275.00)	$0.00	02215	Lockbox Payment
7/1/2011	Sun City Anthem QT Assmt	$250.00	$250.00		Sun City Anthem QT Assmt
7/30/2011	Late Fees	$25.00	$275.00		Late Fees
8/18/2011	Association Mgmt Payment	($275.00)	$0.00	02227	Lockbox Payment

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RRFS
RED ROCK FINANCIAL SERVICES

Red Rock Financial Services

Account Detail

Information as of: August 15, 2014

Sun City Anthem Community Association

Red Rock Financial Service
Account Number: 808634
Property Address: 2763 White Sage Dr, Henderson, NV 89052
Homeowner(s): The Gordon B. Hansen Trust, dated August 22, 2008;The Gordon B. Hansen Trust, dated August 22, 2008;SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC. ;WESTERN THRIFT & LOAN;MERS ;BANK OF AMERICA, N.A. ;WELLS FARGO BANK, N.A. ;State of Nevada Ombudsman for Common-Interest Communities;REPUBLIC SERVICES

10/1/2011	Sun City Anthem QT Assmt	$250.00	$250.00		Sun City Anthem QT Assmt
10/11/2011	Association Mgmt Payment	($240.00)	$10.00	52791	Lockbox Payment
11/22/2011	Association Mgmt Payment	($10.00)	$0.00	61105	Lockbox Payment
1/1/2012	Sun City Anthem QT Assmt	$275.00	$275.00		Sun City Anthem QT Assmt
1/30/2012	Late Fees	$25.00	$300.00		Late Fees
2/21/2012	Association Mgmt Payment	($300.00)	$0.00	00112	Lockbox Payment
4/1/2012	Sun City Anthem QT Assmt	$275.00	$275.00		Sun City Anthem QT Assmt
4/26/2012	Association Mgmt Payment	($275.00)	$0.00	127	Receipt Processing
7/1/2012	Sun City Anthem QT Assmt	$275.00	$275.00		Sun City Anthem QT Assmt
7/31/2012	Late Fees	$25.00	$300.00		Late Fees
8/31/2012	Late Fees	$25.00	$325.00		Late Fees
9/13/2012	Management Company Collection Cost	$150.00	$475.00		Management Company Collection Fee
9/17/2012	Intent to Lien Letter	$125.00	$600.00		
9/17/2012	Mailing Costs	$8.97	$608.97		
9/17/2012	Mailing Costs	$8.97	$617.94		
9/24/2012	Vendor Adjustment	($150.00)	$467.94		
9/30/2012	Late Fees	$25.00	$492.94		Late Fees
9/30/2012	Interest	$1.21	$494.15		Interest
10/1/2012	Sun City Anthem QT Assmt	$275.00	$769.15		Sun City Anthem QT Assmt
10/18/2012	Red Rock Partial Payment	($300.00)	$469.15	PC 143	Partial Payment
10/31/2012	Late Fees	$25.00	$494.15		Late Fees
11/30/2012	Late Fees	$25.00	$519.15		Late Fees
12/5/2012	Lien Recording Costs	$34.00	$553.15		
12/5/2012	Lien Release	$30.00	$583.15		
12/5/2012	Lien for Delinquent Assessment	$325.00	$908.15		
12/5/2012	Mailing Costs	$8.20	$916.35		

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RRFS
RED ROCK FINANCIAL SERVICES

Red Rock Financial Services

Account Detail

Information as of: August 15, 2014

Sun City Anthem Community Association

Red Rock Financial Service Account Number: 808634

Property Address: 2763 White Sage Dr, Henderson, NV 89052

Homeowner(s): The Gordon B. Hansen Trust, dated August 22, 2008;The Gordon B. Hansen Trust, dated August 22, 2008;SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC. ;WESTERN THRIFT & LOAN;MERS ;BANK OF AMERICA, N.A. ;WELLS FARGO BANK, N.A. ;State of Nevada Ombudsman for Common-Interest Communities;REPUBLIC SERVICES

12/5/2012	Mailing Costs	$8.20	$924.55	
12/20/2012	Payoff Demand	$150.00	$1,074.55	Ticor Title
12/31/2012	Late Fees	$25.00	$1,099.55	Late Fees
12/31/2012	Interest	$1.10	$1,100.65	Interest
1/1/2013	Sun City Anthem QT Assmt	$275.00	$1,375.65	Sun City Anthem QT Assmt
1/16/2013	Payoff Demand	$50.00	$1,425.65	Ticor Title
1/31/2013	Late Fees	$25.00	$1,450.65	Late Fees
2/5/2013	Intent to NOD	$90.00	$1,540.65	
3/2/2013	Late Fees	$25.00	$1,565.65	Late Fees
3/2/2013	Late Fees	($25.00)	$1,540.65	Sun City Anthem QT Assmt
3/7/2013	NOD Mailing Costs	$85.70	$1,626.35	
3/7/2013	Notice of Default	$400.00	$2,026.35	
3/7/2013	NOD Recording Costs	$22.00	$2,048.35	
3/7/2013	NOD Release	$30.00	$2,078.35	
3/7/2013	NOD Release Recording Costs	$22.00	$2,100.35	
3/7/2013	Trustee Sale Guarantee	$350.00	$2,450.35	
3/27/2013	Vendor Adjustment	($350.00)	$2,100.35	
3/27/2013	Red Rock Fee Adjustment	($559.70)	$1,540.65	
3/31/2013	Late Fees	$25.00	$1,565.65	Late Fees
3/31/2013	Interest	$2.31	$1,567.96	Interest
4/1/2013	Sun City Anthem QT Assmt	$275.00	$1,842.96	Sun City Anthem QT Assmt
4/2/2013	Late Fees	$25.00	$1,867.96	Late Fees
4/2/2013	Late Fees	($25.00)	$1,842.96	Rev 04/02/13 LF
4/4/2013	NOD Mailing Costs	$85.70	$1,928.66	
4/4/2013	Notice of Default	$400.00	$2,328.66	
4/4/2013	NOD Recording Costs	$22.00	$2,350.66	

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RRFS
RED ROCK FINANCIAL SERVICES

Red Rock Financial Services

Account Detail

Information as of: August 15, 2014

Sun City Anthem Community Association

Red Rock Financial Service Account Number: 808634

Property Address: 2763 White Sage Dr, Henderson, NV 89052

Homeowner(s): The Gordon B. Hansen Trust, dated August 22, 2008;The Gordon B. Hansen Trust, dated August 22, 2008;SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC. ;WESTERN THRIFT & LOAN;MERS ;BANK OF AMERICA, N.A. ;WELLS FARGO BANK, N.A. ;State of Nevada Ombudsman for Common-Interest Communities;REPUBLIC SERVICES

4/4/2013	NOD Release	$30.00	$2,380.66	
4/4/2013	NOD Release Recording Costs	$22.00	$2,402.66	
4/4/2013	Trustee Sale Guarantee	$350.00	$2,752.66	
4/4/2013	NOD Mailing Charges Adjustment	($25.71)	$2,726.95	
4/30/2013	Payoff Demand	$150.00	$2,876.95	Miles Bauer
5/1/2013	Late Fees	$25.00	$2,901.95	Late Fees
5/29/2013	Payoff Demand	$150.00	$3,051.95	Proudfit Realty
5/31/2013	Late Fees	$25.00	$3,076.95	Late Fees
6/25/2013	Intent to NOS	$90.00	$3,166.95	
6/30/2013	Late Fees	$25.00	$3,191.95	Late Fees
6/30/2013	Interest	$3.52	$3,195.47	Interest
7/1/2013	Sun City Anthem QT Assmt	$275.00	$3,470.47	Sun City Anthem QT Assmt
7/31/2013	Late Fees	$25.00	$3,495.47	Late Fees
8/15/2013	Intent to Conduct Foreclosure	$25.00	$3,520.47	
8/31/2013	Late Fees	$25.00	$3,545.47	Late Fees
9/30/2013	Late Fees	$25.00	$3,570.47	Late Fees
9/30/2013	Interest	$4.73	$3,575.20	Interest
10/1/2013	Sun City Anthem QT Assmt	$275.00	$3,850.20	Sun City Anthem QT Assmt
10/31/2013	Late Fees	$25.00	$3,875.20	Late Fees
11/30/2013	Late Fees	$25.00	$3,900.20	Late Fees
12/31/2013	Late Fees	$25.00	$3,925.20	Late Fees
12/31/2013	Interest	$5.94	$3,931.14	Interest
12/31/2013	Late Fees	($25.00)	$3,906.14	Reverse LF
1/1/2014	Sun City Anthem QT Assmt	$275.00	$4,181.14	Sun City Anthem QT Assmt
1/29/2014	Intent to Conduct Foreclosure	$25.00	$4,206.14	
1/30/2014	Late Fees	$25.00	$4,231.14	Late Fees

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RED ROCK FINANCIAL SERVICES

Red Rock Financial Services

Account Detail

Information as of: August 15, 2014

Sun City Anthem Community Association

Red Rock Financial Service Account Number: 808634

Property Address: 2763 White Sage Dr, Henderson, NV 89052

Homeowner(s): The Gordon B. Hansen Trust, dated August 22, 2008;The Gordon B. Hansen Trust, dated August 22, 2008;SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC. ;WESTERN THRIFT & LOAN;MERS ;BANK OF AMERICA, N.A. ;WELLS FARGO BANK, N.A. ;State of Nevada Ombudsman for Common-Interest Communities;REPUBLIC SERVICES

2/11/2014	NOS Mailing Costs	$8.96	$4,240.10	
2/11/2014	NOS Mailing Costs	$8.96	$4,249.06	
2/11/2014	NOS Mailing Costs	$8.96	$4,258.02	
2/11/2014	NOS Mailing Costs	$8.96	$4,266.98	
2/11/2014	NOS Mailing Costs	$8.96	$4,275.94	
2/11/2014	NOS Mailing Costs	$8.96	$4,284.90	
2/11/2014	NOS Mailing Costs	$8.96	$4,293.86	
2/11/2014	NOS Mailing Costs	$8.96	$4,302.82	
2/11/2014	NOS Mailing Costs	$8.96	$4,311.78	
2/11/2014	Notice of Sale	$275.00	$4,586.78	
2/11/2014	Publishing and Posting Costs	$496.67	$5,083.45	
2/11/2014	NOS Recording Costs	$23.00	$5,106.45	
3/30/2014	Interest	$7.15	$5,113.60	Interest
4/1/2014	Sun City Anthem QT Assmt	$275.00	$5,388.60	Sun City Anthem QT Assmt
4/30/2014	Late Fees	$25.00	$5,413.60	Late Fees
5/30/2014	Interest	$8.36	$5,421.96	Interest
6/30/2014	Interest	$8.36	$5,430.32	Interest
7/1/2014	Sun City Anthem QT Assmt	$275.00	$5,705.32	Sun City Anthem QT Assmt
7/30/2014	Late Fees	$25.00	$5,730.32	Late Fees
7/30/2014	Association Interest	$8.36	$5,738.68	
8/15/2014	Conduct Foreclosure Sale	$125.00	$5,863.68	
8/15/2014	Prepare and Record Trustee Deed	$125.00	$5,988.68	

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EXHIBIT 3

Red Rock Financial Services

September 17, 2012 VIA CERTIFIED AND FIRST CLASS MAIL

Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear Gordon B. Hansen,

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Sun City Anthem Community Association (herein also called the Association) has given permission under its agency agreement to Red Rock Financial Services to collect past due homeowner's association assessments. Accounting information obtained from the association or its managing agent, in regards to account balance, will not be accurate as additional collection fees and costs have been added to the above account.

The current balance due on the above account is $617.94. If you choose to reinstate the account, payment in full must be received in the Red Rock Financial Services office within 30 days from the date of this letter. Payment must be in the form of a cashier's check or money order, made payable to Red Rock Financial Services and mailed to the address indicated below. Please ensure the account number is listed on any payments remitted to our office.

A "30 Day Period" has been established for disputing the validity of the debt, or any portion thereof. The "30 Day Period", according to Federal Law, begins from the date this letter is received by you.

All disputes regarding the validity of the debt must be submitted in written form to Red Rock Financial Services. When the dispute is received, Red Rock Financial Services will provide verification of the debt and a copy of such verification will be mailed to you. Collection efforts on the part of Red Rock Financial Services will cease during the research process. When the research is completed, you will receive a written response. In addition, Red Rock Financial Services will provide you with the original creditor(s) and address(es) if different from the current. In the event that Red Rock Financial Services does not receive in written form, a dispute of the debt, Red Rock Financial Services will assume the debt is valid.

If you choose not to pay your account in full within 30 days from the date of this letter, in accordance with Nevada Revised Statutes, Red Rock Financial Services will prepare and record a Lien for Delinquent Assessments on behalf of Sun City Anthem Community Association. If we receive partial payments, they will be credited to your account, however, we will continue with the collection process on the balance owed as described above. Additional fees estimated in the amount of $340.00 plus mailing fees will be added to the above account to cover the cost of preparing and/or recording the Lien for Delinquent Assessments. Please note these are estimated costs.

Additional information regarding this account can be obtained at www.rrfs.com. Please contact the office of Red Rock Financial Services at 702-932-6887 with any questions.

Regards,

Red Rock Financial Services

Red Rock Financial Services 7251 Amigo Street, Suite 100 Las Vegas, NV 89119

www.rrfs.com Phone: 702-932-6887 Toll Free: 888-319-9460 Fax: 702.341.7733

By sending your check, please be aware that you are authorizing Red Rock Financial Services to use the information on your check to make a one-time electronic debit from your account at the financial institution indicated on your check. This electronic debit will be for the amount of your check; no additional amount will be added to the amount. (If we cannot collect your electronic payment, we will issue a draft against your account.) Please contact the Accounts Receivable department at (702) 932-6887 to learn about other payment options should you prefer to not have your payment processed in this manner.

Red Rock Financial Services

September 17, 2012 VIA CERTIFIED AND FIRST CLASS MAIL

Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear Gordon B. Hansen,

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Regards,

Red Rock Financial Services

Red Rock Financial Services ■ 7251 Amigo Street, Suite 100 Las Vegas, NV 89119

www.rrfs.com ■ Phone: 702-932-6887 Toll Free: 888-319-9460 Fax: 702.341.7733

By sending your check, please be aware that you are authorizing Red Rock Financial Services to use the information on your check to make a one-time electronic debit from your account at the financial institution indicated on your check. This electronic debit will be for the amount of your check; no additional amount will be added to the amount. (If we cannot collect your electronic payment, we will issue a draft against your account.) Please contact the Accounts Receivable department at (702) 932-6887 to learn about other payment options should you prefer to not have your payment processed in this manner.

EXHIBIT 4

Anthem
SUN CITY

Hearing Notice and Sanction for Delinquent Account

2450 Hampton RD * Henderson * NV * 89052
t.702-614-5816/5817 * f.866-941-5644 * e. homeownerresponse@scacai.com
w.https://www.sca-hoa.org

Certified Article Number
7160 3901 9849 6408 7011
SENDERS RECORD

Thursday, September 20, 2012

Gordon B. Hansen
2664 Olivia Heights Ave
Henderson NV 89052

COPY

Subject: **Suspension of Membership Privileges for Delinquent Accounts**

Property Address: 2763 White Sage Dr Henderson NV 89052

Violation Type: Assessments/Fines/Violations - Delinquency
Last Inspection Date (if applicable): NA

Reference/Requirement: CC&R 7.4 Compliance & Enforcement, CC&R 8.7 Obligation for Assessment

Dear Gordon B. Hansen,

Your account is listed as delinquent and is now at collection with the Red Rock Financial Services (RRFS) which is a debt collection agency. Therefore, as required by the Board of Directors, your membership privileges shall be suspended on the date of the hearing if RRFS records indicate the account remains at collection for an amount in excess of $99.00. **This is the only notice of this hearing and the sanction. The hearing is scheduled for *10/10/2012 at 9:00 AM at the Anthem Center*. If you plan to attend the hearing PLEASE BRING PROOF that your account is paid in full (current).**

Attendance at the hearing is not required. **If you do not have proof your account is current, and you want to appeal or dispute the Association charges on your account, please follow the process described on the enclosed sheet (Collection Account Inquiry Procedures).**

As a service, you will be provided the opportunity to meet with an RRFS representative to discuss your account at Anthem Center on the day of your hearing.

You have the right to appeal the decision to impose this sanction. To do so you must submit a written appeal to the Board of Directors at Sun City Anthem within 15 days after the hearing date at the following address:

Sun City Anthem Community Association, Inc
ATTN: Board of Directors
2450 Hampton Road
Henderson NV 89052

Received
OCT 09 2012
RRFS

On behalf of the Association,

Sacha Fotu
Sun City Anthem Community Association Manager
RMI Management, LLC

EXHIBIT 5

808634

CORRESPONDENCE RECEIVED

10/8/2012

808634 NV

October 3, 2012

To: SCAHOA

Re: Delinquent HOA Dues for 2763 White Sage Dr.

Enclosed please find:

1. Certificate of death for Gordon B. Hansen, property owner, on 1/14/2012
2. Check for $300 HOA dues

On 2/14/2012, I listed Mr. Hansen's property for short sale with the Proudfit Realty Company. I continued to pay the HOA dues owed on the property, and wrote the enclosed check on 8/17/2012. Unfortunately I failed to mail the check in a timely fashion. Subsequently, an offer was placed on the property as a short sale, and it is my understanding that the buyers will be moving in within the next month.

It is my request that the HOA pursue collection of any future HOA dues from the buyers within the escrow or from them directly once the sale is complete or however you normally handle cases in which the owner is deceased.

Any questions, please contact Doug Proudfit.

Thank you.

Nona Tobin
2664 Olivia Heights Ave.
Henderson NV 89052

Received
OCT 2 8 2012
CBFS

Anthem
SUN CITY

Hearing Notice and Sanction for Delinquent Account

2450 Hampton RD * Henderson * NV * 89052
t.702-614-5816/5817 * f.866-941-5644 * e. homeownerresponse@scacai.com
w.https://www.sca-hoa.org

Certified Article Number
7160 3901 9849 6408 7011
SENDERS RECORD

Thursday, September 20, 2012

Gordon B. Hansen
2664 Olivia Heights Ave
Henderson NV 89052

COPY

Subject: **Suspension of Membership Privileges for Delinquent Accounts**

Property Address: 2763 White Sage Dr Henderson NV 89052

Violation Type: Assessments/Fines/Violations - Delinquency
Last Inspection Date (if applicable): NA

Reference/Requirement: CC&R 7.4 Compliance & Enforcement, CC&R 8.7 Obligation for Assessment

Dear Gordon B. Hansen,

Your account is listed as delinquent and is now at collection with the Red Rock Financial Services (RRFS) which is a debt collection agency. Therefore, as required by the Board of Directors, your membership privileges shall be suspended on the date of the hearing if RRFS records indicate the account remains at collection for an amount in excess of $99.00. **This is the only notice of this hearing and the sanction. The hearing is scheduled for *10/10/2012 at 9:00 AM at the Anthem Center*. If you plan to attend the hearing PLEASE BRING PROOF that your account is paid in full (current).**

Attendance at the hearing is not required. **If you do not have proof your account is current, and you want to appeal or dispute the Association charges on your account, please follow the process described on the enclosed sheet (Collection Account Inquiry Procedures).**

As a service, you will be provided the opportunity to meet with an RRFS representative to discuss your account at Anthem Center on the day of your hearing.

You have the right to appeal the decision to impose this sanction. To do so you must submit a written appeal to the Board of Directors at Sun City Anthem within 15 days after the hearing date at the following address:

Sun City Anthem Community Association, Inc
ATTN: Board of Directors
2450 Hampton Road
Henderson NV 89052

Received
OCT 08 2012
RRFS

On behalf of the Association,

Sacha Fotu
Sun City Anthem Community Association Manager
RMI Management, LLC

Anthem SUN CITY

Hearing Notice and Sanction for Delinquent Account

2450 Hampton RD * Henderson * NV * 89052
t.702-614-5816/5817 * f.866-941-5644 * e. homeownerresponse@scacai.com
w.https://www.sca-hoa.org

Certified Article Number
7160 3901 9849 6408 7011
SENDERS RECORD

Thursday, September 20, 2012

Gordon B. Hansen
2664 Olivia Heights Ave
Henderson NV 89052

COPY

Subject: **Suspension of Membership Privileges for Delinquent Accounts**

Property Address: 2763 White Sage Dr Henderson NV 89052

Violation Type: Assessments/Fines/Violations - Delinquency
Last Inspection Date (if applicable): NA

Reference/Requirement: CC&R 7.4 Compliance & Enforcement, CC&R 8.7 Obligation for Assessment

Dear Gordon B. Hansen,

Your account is listed as delinquent and is now at collection with the Red Rock Financial Services (RRFS) which is a debt collection agency. Therefore, as required by the Board of Directors, your membership privileges shall be suspended on the date of the hearing if RRFS records indicate the account remains at collection for an amount in excess of $99.00. **This is the only notice of this hearing and the sanction. The hearing is scheduled for *10/10/2012 at 9:00 AM at the Anthem Center*. If you plan to attend the hearing PLEASE BRING PROOF that your account is paid in full (current).**

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As a service, you will be provided the opportunity to meet with an RRFS representative to discuss your account at Anthem Center on the day of your hearing.

You have the right to appeal the decision to impose this sanction. To do so you must submit a written appeal to the Board of Directors at Sun City Anthem within 15 days after the hearing date at the following address:

Sun City Anthem Community Association, Inc
ATTN: Board of Directors
2450 Hampton Road
Henderson NV 89052

Received
OCT 1 8 2012
RRFS

On behalf of the Association,

Sacha Fotu
Sun City Anthem Community Association Manager
RMI Management, LLC

[redacted]

EXHIBIT 6

808634

CORRESPONDENCE RESPONSE SENT TO HOMEOWNER

11/5/2012

Red Rock Financial Services

November 5, 2012

The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear The Estate of Gordon B. Hansen,

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Red Rock Financial Services is in receipt of the correspondence that the Homeowner has passed away. Our records have been updated to reflect that Gordon B. Hansen has passed away. Please be advised that our office has been retained to collect the delinquent balance owed to Sun City Anthem Community Association. Please contact our office within thirty (30) days from the date of this letter to discuss payment arrangements.

The current balance on the account is $495.36. Enclosed is an accounting ledger for your review. Payments must be in the form of a cashier's check or money order made payable to Red Rock Financial Services and mailed to the address below. Failure to remit payment within 30 days from the date of this letter may result in the continuation of the collection process at additional costs to you.

Additional information regarding this account can be obtained at www.rrfs.com. Please contact the office of Red Rock Financial Services at 702-932-6887 with any questions.

Sincerely,

Red Rock Financial Services
Enclosure(S)

Red Rock Financial Services ■ 7251 Amigo Street, Suite 100 Las Vegas, NV 89119

www.rrfs.com ■ Phone: 702-932-6887 Toll Free: 888-319-9460 Fax: 702.341.7733

By sending your check, please be aware that you are authorizing Red Rock Financial Services to use the information on your check to make a one-time electronic debit from your account at the financial institution indicated on your check. This electronic debit will be for the amount of your check; no additional amount will be added to the amount. (If we cannot extend your electronic payment, we will issue a draft against your account.) Please contact the Accounts Receivable department at (702) 932-6887 to learn about other payment options should you prefer to not have your payment processed in this manner.

Red Rock Financial Services

November 5, 2012

The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear The Estate of Gordon B. Hansen,

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Red Rock Financial Services is in receipt of the correspondence that the Homeowner has passed away. Our records have been updated to reflect that Gordon B. Hansen has passed away. Please be advised that our office has been retained to collect the delinquent balance owed to Sun City Anthem Community Association. Please contact our office within thirty (30) days from the date of this letter to discuss payment arrangements.

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Red Rock Financial Services
Enclosure(S)

Red Rock Financial Services ■ 7251 Amigo Street, Suite 100 Las Vegas, NV 89119

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Red Rock Financial Services
Account Detail
Sun City Anthem Community Association

Information as of: November 5, 2012

Red Rock Financial Services Account Number: R808634
Property Address: 2763 White Sage Dr, Henderson, NV 89052
Hansen, The Estate of Gordon B.

Detailed Summary

Date	Description	Amount	Balance	Check#
01/01/2006	Quarterly Assessment	$235.00	$235.00	
02/01/2006	Association Mgmt Payment	-$235.00	$0.00	
04/01/2006	Quarterly Assessment	$235.00	$235.00	
04/18/2006	Association Mgmt Payment	-$235.00	$0.00	
07/01/2006	Quarterly Assessment	$235.00	$235.00	
07/12/2006	Association Mgmt Payment	-$235.00	$0.00	
10/01/2006	Quarterly Assessment	$235.00	$235.00	
10/26/2006	Association Mgmt Payment	-$235.00	$0.00	
01/01/2007	Quarterly Assessment	$235.00	$235.00	
01/11/2007	Association Mgmt Payment	-$235.00	$0.00	
03/08/2007	Association Mgmt Payment	-$235.00	-$235.00	
04/01/2007	Quarterly Assessment	$235.00	$0.00	
06/08/2007	Association Mgmt Payment	-$235.00	-$235.00	
07/01/2007	Quarterly Assessment	$235.00	$0.00	
10/01/2007	Sun City Anthem QT Assmt	$235.00	$235.00	
10/11/2007	Association Mgmt Payment	-$235.00	$0.00	1873
01/01/2008	Sun City Anthem QT Assmt	$275.00	$275.00	
01/11/2008	Association Mgmt Payment	-$275.00	$0.00	6761
03/01/2008	Special Assessment	-$81.32	-$81.32	
03/01/2008	Special Assessment	$81.32	$0.00	
04/01/2008	Sun City Anthem QT Assmt	$275.00	$275.00	
04/08/2008	Association Mgmt Payment	-$275.00	$0.00	3313
06/01/2008	Unit Repair	$81.32	$81.32	
06/25/2008	Association Mgmt Payment	-$81.32	$0.00	2044
07/01/2008	Sun City Anthem QT Assmt	$275.00	$275.00	

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Red Rock Financial Services
Account Detail
Sun City Anthem Community Association

Information as of: November 5, 2012

Red Rock Financial Services Account Number: R808634
Property Address: 2763 White Sage Dr, Henderson, NV 89052
Hansen, The Estate of Gordon B.

Detailed Summary

Date	Description	Amount	Balance	Check#
07/11/2008	Association Mgmt Payment	-$275.00	$0.00	6578
09/25/2008	Association Mgmt Payment	-$175.00	-$175.00	02057
10/01/2008	Sun City Anthem QT Assmt	$175.00	$0.00	
12/31/2008	Association Mgmt Payment	-$240.00	-$240.00	02074
01/01/2009	Sun City Anthem QT Assmt	$240.00	$0.00	
04/01/2009	Sun City Anthem QT Assmt	$240.00	$240.00	
04/07/2009	Association Mgmt Payment	-$240.00	$0.00	02090
07/01/2009	Sun City Anthem QT Assmt	$240.00	$240.00	
07/13/2009	Association Mgmt Payment	-$240.00	$0.00	23791
10/09/2009	Association Mgmt Payment	-$240.00	-$240.00	97004
01/01/2010	Sun City Anthem QT Assmt	$240.00	$0.00	
01/25/2010	Association Mgmt Payment	-$240.00	-$240.00	10803
04/01/2010	Sun City Anthem QT Assmt	$240.00	$0.00	
07/01/2010	Sun City Anthem QT Assmt	$240.00	$240.00	
07/30/2010	Late Fee	$25.00	$265.00	
08/16/2010	Association Mgmt Payment	-$265.00	$0.00	63164
10/07/2010	Association Mgmt Payment	-$240.00	-$240.00	98965
01/01/2011	Sun City Anthem QT Assmt	$250.00	$10.00	
02/18/2011	Association Mgmt Payment	-$10.00	$0.00	84899
04/01/2011	Sun City Anthem QT Assmt	$250.00	$250.00	
04/30/2011	Late Fee	$25.00	$275.00	
05/20/2011	Association Mgmt Payment	-$275.00	$0.00	02215
07/01/2011	Sun City Anthem QT Assmt	$250.00	$250.00	
07/30/2011	Late Fee	$25.00	$275.00	
08/18/2011	Association Mgmt Payment	-$275.00	$0.00	02227

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Red Rock Financial Services
Account Detail
Sun City Anthem Community Association

Information as of: November 5, 2012

Red Rock Financial Services Account Number: R808634
Property Address: 2763 White Sage Dr, Henderson, NV 89052
Hansen, The Estate of Gordon B.

Detailed Summary

Date	Description	Amount	Balance	Check#
10/01/2011	Sun City Anthem QT Assmt	$250.00	$250.00	
10/11/2011	Association Mgmt Payment	-$240.00	$10.00	52791
11/22/2011	Association Mgmt Payment	-$10.00	$0.00	61105
01/01/2012	Sun City Anthem QT Assmt	$275.00	$275.00	
01/30/2012	Late Fee	$25.00	$300.00	
02/21/2012	Association Mgmt Payment	-$300.00	$0.00	00112
04/01/2012	Sun City Anthem QT Assmt	$275.00	$275.00	
04/26/2012	Association Mgmt Payment	-$275.00	$0.00	127
07/01/2012	Sun City Anthem QT Assmt	$275.00	$275.00	
07/31/2012	Late Fee	$25.00	$300.00	
08/31/2012	Late Fee	$25.00	$325.00	
09/13/2012	Management Company Collection Cost	$150.00	$475.00	
09/17/2012	Intent to Lien Letter	$125.00	$600.00	
09/17/2012	Intent Mailing Costs	$8.97	$608.97	
09/17/2012	Intent Mailing Costs	$8.97	$617.94	
09/24/2012	Vendor Adjustment	-$150.00	$467.94	
09/30/2012	Late Fee	$25.00	$492.94	
09/30/2012	Interest	$1.21	$494.15	
10/01/2012	Sun City Anthem QT Assmt	$275.00	$769.15	
10/18/2012	Red Rock Partial Payment	-$300.00	$469.15	PC 143
10/30/2012	Association Interest	$1.21	$470.36	
10/31/2012	Late Fee	$25.00	$495.36	

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Printed: 11/5/12

808634

PAYMENT ALLOCATION

11/9/2012

AA 000701

Payment Allocation Report

RRFS Account: **808634**
Mgmt Account: **SUCI0002048001**
Information as of: **October 18, 2012**

Account Information

Company:	RMI Management
Association:	Sun City Anthem Community Association
Property Address:	2763 White Sage Dr, Henderson NV 89052
Owners:	Gordon B. Hansen; Gordon B. Hansen;

Payment Summary

Payment Processed	**$300.00**
Allocation Categories	
Association	$300.00
Total Allocations	**$300.00**

Payment Detail

Date:	Description:	Code:	Amount:	Check:	Memo:
10/18/2012	Red Rock Partial Payment	PPRR	300.00	PC 143	Partial Payment

Association Allocation Detail

Assessment		Total:	$275.00
Date:	Description:	Code:	Amount:
07/01/2012	Sun City Anthem QT Assmt	SQA	275.00

Late Fee		Total:	$25.00
Date:	Description:	Code:	Amount:
07/31/2012	Late Fee	LF	25.00

Corporate Office: 7251 Amigo Street, Suite 100, Las Vegas, NV 89119 Phone: (702) 932-6887 Fax: (702) 341-7733
Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

EXHIBIT 7

Assessor Parcel Number: 191-13-811-052
File Number: R808634

Accommodation

Inst #: 201212140001338
Fees: $17.00
N/C Fee: $0.00
12/14/2012 09:37:58 AM
Receipt #: 1421501
Requestor:
NORTH AMERICAN TITLE COMPAN
Recorded By: MSH Pgs: 1
DEBBIE CONWAY
CLARK COUNTY RECORDER

LIEN FOR DELINQUENT ASSESSMENTS

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

NOTICE IS HEREBY GIVEN: Red Rock Financial Services, a division of RMI Management LLC, officially assigned as agent by the Sun City Anthem Community Association, herein also called the Association, in accordance with Nevada Revised Statues 116 and outlined in the Association Covenants, Conditions, and Restrictions, herein also called CC&R's, recorded on 10/31/2000, in Book Number 20001031, as Instrument Number 02253 and including any and all Amendments and Annexations et. seq., of Official Records of Clark County, Nevada, which have been supplied to and agreed upon by said owner.

Said Association imposes a Lien for Delinquent Assessments on the commonly known property:
2763 White Sage Dr, Henderson, NV 89052
SUN CITY ANTHEM UNIT #19 PHASE 2 PLAT BOOK 102 PAGE 80 LOT 85 BLOCK 4, in the County of Clark

Current Owner(s) of Record:
GORDON B. HANSEN, TRUSTEE OF THE GORDON B. HANSEN TRUST, DATED AUGUST 22, 2008

The amount owing as of the date of preparation of this lien is **$925.76.
This amount includes assessments, late fees, interest, fines/violations and collection fees and costs.
** The said amount may increase or decrease as assessments, late fees, interest, fines/violations, collection fees, costs or partial payments are applied to the account.

Dated: December 5, 2012

Prepared By Rebecca Tom, Red Rock Financial Services, on behalf of Sun City Anthem Community Association

STATE OF NEVADA)
COUNTY OF CLARK)

On December 5, 2012, before me, personally appeared Rebecca Tom, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

When Recorded Mail To: Red Rock Financial Services
7251 Amigo Street, Suite 100
Las Vegas, Nevada 89119
702-932-6887

MERYL R. FISHER
Notary Public State of Nevada
No. 12-7488-1
My appt. exp. Apr. 20, 2016

EXHIBIT 8

Inst #: 201303120000847
Fees: $17.00
N/C Fee: $0.00
03/12/2013 09:55:30 AM
Receipt #: 1629677
Requestor:
NORTH AMERICAN TITLE SUNSET
Recorded By: MSH Pgs: 1
DEBBIE CONWAY
CLARK COUNTY RECORDER

Assessor Parcel Number: 191-13-811-052
File Number: R808634
Property Address: 2763 White Sage Dr
Henderson, NV. 89052
Title Order Number: 39334

NOTICE OF DEFAULT AND ELECTION TO SELL PURSUANT TO THE LIEN FOR DELINQUENT ASSESSMENTS

◆ IMPORTANT NOTICE ◆

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

WARNING! IF YOU FAIL TO PAY THE AMOUNT SPECIFIED IN THIS NOTICE, YOU COULD LOSE YOUR HOME, EVEN IF THE AMOUNT IS IN DISPUTE!

NOTICE IS HEREBY GIVEN: Red Rock Financial Services officially assigned as agent by the Sun City Anthem Community Association, under the Lien for Delinquent Assessments, recorded on 12/14/2012, in Book Number 20121214, as Instrument Number 0001338, reflecting GORDON B. HANSEN, TRUSTEE OF THE GORDON B. HANSEN TRUST, DATED AUGUST 22, 2008 as the owner(s) of record on said lien, land legally described as SUN CITY ANTHEM UNIT #19 PHASE 2 PLAT BOOK 102 PAGE 80 LOT 85 BLOCK 4, of the Official Records in the Office of the Recorder of Clark County, Nevada, makes known the obligation under the Covenants, Conditions and Restrictions recorded 10/31/2000, in Book Number 20001031, as Instrument Number 02253, has been breached. As of 07/01/2012 forward, all assessments, whether monthly or otherwise, late fees, interest, Association charges, legal fees and collection fees and costs, less any credits, have gone unpaid.

Above stated, the Association has equipped Red Rock Financial Services with verification of the obligation according to the Covenants, Conditions and Restriction in addition to documents proving the debt, therefore declaring any and all amounts secured as well as due and payable, electing the property to be sold to satisfy the obligation. In accordance with Nevada Revised Statutes 116, no sale date may be set until the ninety-first (91) day after the recorded date or the mailing date of the Notice of Default and Election to Sell. As of March 7, 2013, the amount owed is $2,475.35. This amount will continue to increase until paid in full.

Dated: March 7, 2013

Prepared By Eungel Watson Red Rock Financial Services, on behalf of Sun City Anthem Community Association

STATE OF NEVADA)
COUNTY OF CLARK)

On March 7, 2013, before me, personally appeared Eungel Watson, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

When Recorded Mail To: Red Rock Financial Services
7251 Amigo Street, Suite 100
Las Vegas, Nevada 89119
702-932-6887

ANNA ROMERO
Notary Public State of Nevada
No. 12-7487-1
My appt. exp. Apr. 20 2016

EXHIBIT 9

Inst #: 201304030001569
Fees: $17.00
N/C Fee: $0.00
04/03/2013 11:28:14 AM
Receipt #: 1660336
Requestor:
NORTH AMERICAN TITLE SUNSET
Recorded By: SUO Pgs: 1
DEBBIE CONWAY
CLARK COUNTY RECORDER

Assessor Parcel Number: 191-13-811-052
File Number: R808634

NOTICE OF RESCISSION

Red Rock Financial Services, a division of RMI Management LLC, is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

NOTICE IS HERBY GIVEN: Red Rock Financial Services officially assigned as agent by the Sun City Anthem Community Association which the Lien for Delinquent Assessments was executed on 12/14/2012 as Book 20121214 and Instrument Number 0001338 of the Official Records in the Office of the Recorder of Clark County, Nevada and affecting the following described property situated in the County of Clark, State of Nevada, and more commonly known as:

2763 White Sage Dr, Henderson, NV 89052
SUN CITY ANTHEM UNIT #19 PHASE 2 PLAT BOOK 102 PAGE 80 LOT 85 BLOCK 4, recorded at the Clark County, Nevada Recorders Office.

The owner(s) of record on said lien: GORDON B. HANSEN, TRUSTEE OF THE GORDON B. HANSEN TRUST, DATED AUGUST 22, 2008

Red Rock Financial Services and / or Sun City Anthem Community Association does hereby cancel, rescind and withdraw the Notice of Default and Election to Sell Pursuant to the Lien for Delinquent Assessments, recorded on 03/12/2013 as Book 20130312 and Instrument Number 0000847 of the Official Records in the Office of the Recorder of Clark County, Nevada.

Dated March 27, 2013

Eungel Watson

Prepared By Eungel Watson, Red Rock Financial Services, on behalf of Sun City Anthem Community Association

STATE OF NEVADA)
COUNTY OF CLARK)

On March 27, 2013, before me, personally appeared Eungel Watson, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Elizabeth Cernak

ELIZABETH CERNAK
Notary Public State of Nevada
No.04-91116-1
My appt. exp. July 25, 2016

When Recorded Mail To: Red Rock Financial Services
7251 Amigo Street, Suite 100
Las Vegas, Nevada 89119

EXHIBIT 10

Inst #: 201304080001087
Fees: $17.00
N/C Fee: $0.00
04/08/2013 09:51:05 AM
Receipt #: 1666431
Requestor:
NORTH AMERICAN TITLE SUNSET
Recorded By: MAT Pgs: 1
DEBBIE CONWAY
CLARK COUNTY RECORDER

Assessor Parcel Number: 191-13-811-052
File Number: R808634
Property Address: 2763 White Sage Dr
Henderson, NV 89052
Title Order Number: 39334 RS

NOTICE OF DEFAULT AND ELECTION TO SELL PURSUANT TO THE LIEN FOR DELINQUENT ASSESSMENTS

◆ IMPORTANT NOTICE ◆

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

WARNING! IF YOU FAIL TO PAY THE AMOUNT SPECIFIED IN THIS NOTICE, YOU COULD LOSE YOUR HOME, EVEN IF THE AMOUNT IS IN DISPUTE!

NOTICE IS HEREBY GIVEN: Red Rock Financial Services officially assigned as agent by the Sun City Anthem Community Association, under the Lien for Delinquent Assessments, recorded on 12/14/2012, in Book Number 20121214, as Instrument Number 0001338, reflecting GORDON B. HANSEN, TRUSTEE OF THE GORDON B. HANSEN TRUST, DATED AUGUST 22, 2008 as the owner(s) of record on said lien, land legally described as SUN CITY ANTHEM UNIT #19 PHASE 2 PLAT BOOK 102 PAGE 80 LOT 85 BLOCK 4, of the Official Records in the Office of the Recorder of Clark County, Nevada, makes known the obligation under the Covenants, Conditions and Restrictions recorded 10/31/2000, in Book Number 20001031, as Instrument Number 02253, has been breached. As of 07/01/2012 forward, all assessments, whether monthly or otherwise, late fees, interest, Association charges, legal fees and collection fees and costs, less any credits, have gone unpaid.

Above stated, the Association has equipped Red Rock Financial Services with verification of the obligation according to the Covenants, Conditions and Restriction in addition to documents proving the debt, therefore declaring any and all amounts secured as well as due and payable, electing the property to be sold to satisfy the obligation. In accordance with Nevada Revised Statutes 116, no sale date may be set until the ninety-first (91) day after the recorded date or the mailing date of the Notice of Default and Election to Sell. As of April 4, 2013, the amount owed is $2,752.66. This amount will continue to increase until paid in full.

Dated: April 4, 2013

Prepared By Bungel Watson Red Rock Financial Services, on behalf of Sun City Anthem Community Association

STATE OF NEVADA)
COUNTY OF CLARK)

On April 4, 2013, before me, personally appeared Bungel Watson, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

When Recorded Mail To: Red Rock Financial Services
4775 W. Teco Avenue, Suite 140
Las Vegas, Nevada 89118
702-932-6887

ELIZABETH CERNAK
Notary Public State of Nevada
No. 04-91116-1
My appt. exp. July 25, 2016

EXHIBIT 11

Inst #: 201402120001527
Fees: $18.00
N/C Fee: $0.00
02/12/2014 09:06:29 AM
Receipt #: 1930419
Requestor:
RED ROCK FINANCIAL SERVICES
Recorded By: MAT Pgs: 2
DEBBIE CONWAY
CLARK COUNTY RECORDER

Assessor Parcel Number: 191-13-811-052
File Number: R808634
Property Address: 2763 White Sage Dr
Henderson, NV 89052

NOTICE OF FORECLOSURE SALE

UNDER THE LIEN FOR DELINQUENT ASSESSMENTS

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

WARNING! A SALE OF YOUR PROPERTY IS IMMINENT! UNLESS YOU PAY THE AMOUNT SPECIFIED IN THIS NOTICE BEFORE THE SALE DATE, YOU COULD LOSE YOUR HOME, EVEN IF THE AMOUNT IS IN DISPUTE. YOU MUST ACT BEFORE THE SALE DATE. IF YOU HAVE ANY QUESTIONS, PLEASE CALL RED ROCK FINANCIAL SERVICES AT (702) 932-6887 or (702) 215-8130. IF YOU NEED ASSISTANCE, PLEASE CALL THE FORECLOSURE SECTION OF THE OMBUDSMAN'S OFFICE, NEVADA REAL ESTATE DIVISION AT (877) 829-9907 IMMEDIATELY.

Red Rock Financial Services officially assigned as agent by the Sun City Anthem Community Association under the Lien for Delinquent Assessments. **YOU ARE IN DEFAULT UNDER THE LIEN FOR DELINQUENT ASSESSMENTS**, recorded on 12/14/2012 in Book Number 20121214 as Instrument Number 0001338 reflecting GORDON B. HANSEN, TRUSTEE OF THE GORDON B. HANSEN TRUST, DATED AUGUST 22, 2008 as the owner(s) of record on said lien. **UNLESS YOU TAKE ACTION TO PROTECT YOUR PROPERTY, IT MAY BE SOLD AT PUBLIC SALE.** If you need an explanation of the nature of the proceedings against you, you should contact an attorney.

The Notice of Default and Election to Sell Pursuant to the Lien for Delinquent Assessments was recorded on 04/08/2013 in Book Number 20130408 as Instrument Number 0001087 of the Official Records in the Office of the Recorder.

NOTICE IS HEREBY GIVEN: That on ***03/07/2014***, at ***10:00 a.m.*** at the front entrance of the Nevada Legal News located at 930 South Fourth Street, Las Vegas, Nevada 89101, that the property commonly known as 2763 White Sage Dr, Henderson, NV 89052 and land legally described as SUN CITY ANTHEM UNIT #19 PHASE 2 PLAT BOOK 102 PAGE 80 LOT 85 BLOCK 4 of the Official Records in the

Assessor Parcel Number: 191-13-811-052
File Number: R808634
Property Address: 2763 White Sage Dr
Henderson, NV 89052

Office of the County Recorder of Clark County, Nevada, will sell at public auction to the highest bidder, for cash payable at the time of sale in lawful money of the United States, by cash, a cashier's check drawn by a state or national bank, a cashier's check drawn by a state or federal credit union, state or federal savings and loan association or savings association authorized to do business in the State of Nevada, in the amount of **$5,081.45** as of 2/11/2014, which includes the total amount of the unpaid balance and reasonably estimated costs, expenses and advances at the time of the initial publication of this notice. Any subsequent Association assessments, late fees interest, expenses or advancements, if any, of the Association or its Agent, under the terms of the Lien for Delinquent Assessments shall continue to accrue until the date of the sale. The property heretofore described is being sold "as is".

The sale will be made without covenant or warranty, expressed or implied regarding, but not limited to, title or possession, encumbrances, obligations to satisfy any secured or unsecured liens or against all right, title and interest of the owner, without equity or right of redemption to satisfy the indebtedness secured by said Lien, with interest thereon, as provided in the Declaration of Covenants, Conditions and Restrictions, recorded on 10/31/2000, in Book Number 20001031, as Instrument Number 02253 of the Official Records in the Office of the Recorder and any subsequent amendments or updates that may have been recorded.

Dated: February 11, 2014

Prepared By Christie Marling, Red Rock Financial Services, on behalf of Sun City Anthem Community Association

STATE OF NEVADA)
COUNTY OF CLARK)

On February 11, 2014, before me, personally appeared Christie Marling, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Reinstatement Information: (702) 483-2990 or **Sale Information:** (714) 573-7777

When Recorded Mail To:
Red Rock Financial Services
4775 W. Teco Avenue, Suite 140
Las Vegas, Nevada 89118
(702) 483-2996 or (702) 932-6887

ANNA ROMERO
Notary Public State of Nevada
No. 13-7487-1
My appt. exp. Oct. 30, 2016

EXHIBIT 12

808634

LIEN SENT TO HOMEOWNER

1/3/2013

Assessor Parcel Number: 191-13-811-052
File Number: R808634

Accommodation

Inst #: 201212140001338
Fees: $17.00
N/C Fee: $0.00
12/14/2012 09:37:58 AM
Receipt #: 1421501
Requestor:
NORTH AMERICAN TITLE COMPAN
Recorded By: MSH Pgs: 1
DEBBIE CONWAY
CLARK COUNTY RECORDER

LIEN FOR DELINQUENT ASSESSMENTS

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

NOTICE IS HEREBY GIVEN: Red Rock Financial Services, a division of RMI Management LLC, officially assigned as agent by the Sun City Anthem Community Association, herein also called the Association, in accordance with Nevada Revised Statues 116 and outlined in the Association Covenants, Conditions, and Restrictions, herein also called CC&R's, recorded on 10/31/2000, in Book Number 20001031, as Instrument Number 02253 and including any and all Amendments and Annexations et. seq., of Official Records of Clark County, Nevada, which have been supplied to and agreed upon by said owner.

Said Association imposes a Lien for Delinquent Assessments on the commonly known property:
2763 White Sage Dr, Henderson, NV 89052
SUN CITY ANTHEM UNIT #19 PHASE 2 PLAT BOOK 102 PAGE 80 LOT 85 BLOCK 4, in the County of Clark

Current Owner(s) of Record:
GORDON B. HANSEN, TRUSTEE OF THE GORDON B. HANSEN TRUST, DATED AUGUST 22, 2008

The amount owing as of the date of preparation of this lien is **$925.76.
This amount includes assessments, late fees, interest, fines/violations and collection fees and costs.
** The said amount may increase or decrease as assessments, late fees, interest, fines/violations, collection fees, costs or partial payments are applied to the account.

Dated: December 5, 2012

Rebecca Tom

Prepared By Rebecca Tom, Red Rock Financial Services, on behalf of Sun City Anthem Community Association

STATE OF NEVADA)
COUNTY OF CLARK)

On December 5, 2012, before me, personally appeared Rebecca Tom, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Meryl R. Fisher

MERYL R. FISHER
Notary Public State of Nevada
No. 12-7488-1
My appt. exp. Apr. 20, 2016

When Recorded Mail To: Red Rock Financial Services
7251 Amigo Street, Suite 100
Las Vegas, Nevada 89119
702-932-6887

Red Rock Financial Services

January 3, 2013 VIA CERTIFIED AND FIRST CLASS MAIL

The Gordon B. Hansen Trust, dated August 22, 2008
c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052

Re: 2763 White Sage Dr Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear The Gordon B. Hansen Trust, dated August 22, 2008:

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Red Rock Financial Services initial correspondence to you stated that failure to reinstate the above account would result in the Lien for Delinquent Assessments being prepared and recorded on the above referenced property. Noted in the initial correspondence, additional fees and costs have been added to the account balance. As of the date of this letter, the account balance is $1,355.60.

Enclosed, please find a copy of the Lien for Delinquent Assessments. The amount noted on this letter and the Lien for Delinquent Assessments may differ. The "Amount Due" on the Lien for Delinquent Assessments is accurate as of the date of preparation. These variations may be due to additional assessments, late fees, interest, fines and collection fees and costs being assessed to the account. Please contact Red Rock Financial Services to obtain an "up to date" account balance or to discuss alternative payment arrangements. All Payments must be in the form of a cashier's check or money order. Please ensure the account number is listed on any payments remitted to our office. If we receive partial payments, they will be credited to your account, however, we will continue with the collection process on the balance owed as described above.

As of the date of this letter, the "30 Day Period" is still in effect. In the case that Red Rock Financial Services does not receive in written form a dispute of the debt, Red Rock Financial Services will assume the debt is valid. All disputes of the validity of the debt must be submitted in written form to Red Rock Financial Services. When the dispute is received, Red Rock Financial Services will provide verification of the debt and a copy of such verification will be mailed to you. Upon receipt of a written dispute, collection efforts on the part of Red Rock Financial Services will cease. A written response will be provided detailing the result of our findings regarding said dispute.

Allowed by Nevada Revised Statutes, Red Rock Financial Services may record a Notice of Default and Election to Sell no sooner then the 31st day from the mailing of the Lien for Delinquent Assessments. As a courtesy to you, an Intent to Notice of Default courtesy letter will be sent to you via first class mail at an additional charge.

Additional information regarding this account can be obtained at www.rrfs.com. Please contact the office of Red Rock Financial Services at 702-932-6887 with any questions.

Regards,

Red Rock Financial Services
enclosure(s)

Red Rock Financial Services ■ 7251 Amigo Street, Suite 100 Las Vegas, NV 89119

www.rrfs.com ■ Phone: 702-932-6887 Toll Free: 888-319-9460 Fax: 702.341.7733

By sending your check, please be aware that you are authorizing Red Rock Financial Services to use the information on your check to make a one-time electronic debit from your account at the financial institution indicated on your check. This electronic debit will be for the amount of your check; no additional amount will be added to the amount. (If we cannot collect your electronic payment, we will issue a draft against your account.) Please contact the Accounts Receivable department at (702) 932-6887 to learn about other payment options should you prefer to not have your payment processed in this manner.

Red Rock Financial Services

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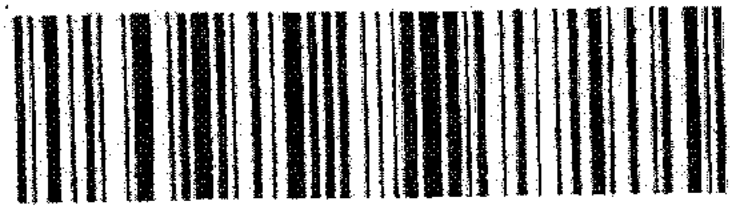
2. Article Number



7196 9008 9111 9954 0614

3. Service Type **CERTIFIED MAIL™**

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

1. Article Addressed to:

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery 9/10/13

C. Signature

X ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634 Sun City Anthem Community Association

SCA00019

AA 000519

PS Form 3811, January 2005 Domestic Return Receipt

Red Rock Financial Services

February 5, 2013

The Gordon B. Hansen Trust, dated August 22, 2008
c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear The Gordon B. Hansen Trust, dated August 22, 2008:

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

This letter is sent to you as a courtesy. As previously advised, Nevada Revised Statutes allows Red Rock Financial Services on behalf of the Association, to record a Notice of Default and Election to Sell no sooner than the 31st day after the mailing of the Lien for Delinquent Assessments. **In 10 days from the date of this letter, the Association will have the legal ability to proceed with the recordation of the Notice of Default and Election to Sell.**

Your choice to not reinstate the above account has resulted in the Lien for Delinquent Assessments, which was mailed to you, being recorded on the above referenced property.

YOU MUST CONTACT OUR OFFICE FOR THE BALANCE DUE. Please contact the Red Rock Financial Services office immediately to make payment in full or alternative payment arrangements. If you do not make payment arrangements within 10 days from the date of this letter, Red Rock Financial Services will have no other alternative but to proceed with the preparation and recordation of the Notice of Default and Election to Sell.

If payment in full or other alternative payment arrangements are not made within 10 days from the date of this letter, the above account will have approximately $825.00 in additional collection fees and costs added to the balance.

To reinstate your account, **you must contact Red Rock Financial Services to obtain "up to date" payoff figures.** Payment must be in the form of a **cashier's check** or **money order**. Please ensure the account number is listed on any payments remitted to our office.

Additional information regarding this account can be obtained at www.rrfs.com. Please contact the office of Red Rock Financial Services at 702-932-6887 with any questions.

Regards,

Red Rock Financial Services

Red Rock Financial Services 7251 Amigo Street, Suite 100 Las Vegas, NV 89119

www.rrfs.com Phone: 702-932-6887 Toll Free: 888-319-9460 Fax: 702.341.7733

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R808634

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If payment in full or other alternative payment arrangements are not made within 10 days from the date of this letter, the above account will have approximately $825.00 in additional collection fees and costs added to the balance.

To reinstate your account, **you must contact Red Rock Financial Services to obtain "up to date" payoff figures.** Payment must be in the form of a **cashier's check** or **money order**. Please ensure the account number is listed on any payments remitted to our office.

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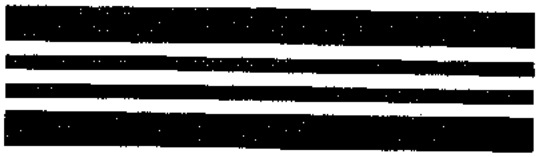

808634

Notice of Default Sent to Homeowner

4/10/2013

RRFS
RED ROCK FINANCIAL SERVICES

April 10, 2013 VIA CERTIFIED AND FIRST CLASS MAIL

The Gordon B. Hansen Trust, dated August 22, 2008
c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear The Gordon B. Hansen Trust, dated August 22, 2008,

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Red Rock Financial Services correspondence to you stated that failure to reinstate the above account would result in the ***Notice of Default and Election to Sell*** being prepared and recorded on the above referenced property. Noted in the correspondence, additional fees and costs have been added to the account balance. Enclosed, please find a copy of the ***Notice of Default and Election to Sell.***

Please contact Red Rock Financial Services to obtain an "up to date" account balance or to discuss alternative payment arrangements. All Payments must be in the form of a cashier's check or money order. Please ensure the account number is listed on any payments remitted to our office. If we receive partial payments, they will be credited to your account, however, we will continue with the collection process on the balance owed as described above.

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RRFS
RED ROCK FINANCIAL SERVICES

April 10, 2013 VIA CERTIFIED AND FIRST CLASS MAIL

The Gordon B. Hansen Trust, dated August 22, 2008
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2763 White Sage Drive
Henderson, NV 89052

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Sun City Anthem Community Association / R808634

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RRFS
RED ROCK FINANCIAL SERVICES

April 10, 2013 VIA CERTIFIED AND FIRST CLASS MAIL

MERS
MIN: 100052550018523257
P.O. BOX 2026
FLINT, MI 48501-2026

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear MERS,

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Red Rock Financial Services correspondence to you stated that failure to reinstate the above account would result in the ***Notice of Default and Election to Sell*** being prepared and recorded on the above referenced property. Noted in the correspondence, additional fees and costs have been added to the account balance. Enclosed, please find a copy of the ***Notice of Default and Election to Sell***.

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RRFS
RED ROCK FINANCIAL SERVICES

April 10, 2013 VIA CERTIFIED AND FIRST CLASS MAIL

BANK OF AMERICA, N.A.
MIN: 100052550018523257
9062 OLD ANNAPOLIS RD
COLUMBIA, MD 21045

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear BANK OF AMERICA, N.A.,

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

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RRFS
RED ROCK FINANCIAL SERVICES

April 10, 2013 VIA CERTIFIED AND FIRST CLASS MAIL

WELLS FARGO BANK, N.A.
LOAN NO. 650-650-5377981-1XXX
101 NORTH PHILLIPS AVENUE
SIOUX FALLS, SD 57104

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear WELLS FARGO BANK, N.A.,

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

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RRFS
RED ROCK FINANCIAL SERVICES

April 10, 2013 VIA CERTIFIED AND FIRST CLASS MAIL

WESTERN THRIFT & LOAN
MIN: 100052550018523257
1101 W. MOANA, SUITE 2
RENO, NV 89509

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear WESTERN THRIFT & LOAN,

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Red Rock Financial Services correspondence to you stated that failure to reinstate the above account would result in the ***Notice of Default and Election to Sell*** being prepared and recorded on the above referenced property. Noted in the correspondence, additional fees and costs have been added to the account balance. Enclosed, please find a copy of the ***Notice of Default and Election to Sell.***

Please contact Red Rock Financial Services to obtain an "up to date" account balance or to discuss alternative payment arrangements. All Payments must be in the form of a cashier's check or money order. Please ensure the account number is listed on any payments remitted to our office. If we receive partial payments, they will be credited to your account, however, we will continue with the collection process on the balance owed as described above.

Additional information regarding this account can be obtained at www.rrfs.com. Please contact Red Rock Financial Services at 702-932-6887 with any questions.

Regards,

Red Rock Financial Services

By sending your check, please be aware that you are authorizing Red Rock Financial Services to use the information on your check to make a one-time electronic debit from your account at the financial institution indicated on your check. This electronic debit will be for the amount of your check; an additional amount will be added to the amount. (If we cannot collect your electronic payment, we will issue a draft against your account.) Please contact the Accounts Receivable department at (702) 932-6887 to learn about other payment options should you prefer to not have your payment processed in this manner.

Inst #: 201304080001087
Fees: $17.00
N/C Fee: $0.00
04/08/2013 09:51:06 AM
Receipt #: 1585431
Requestor:
NORTH AMERICAN TITLE SUNSET
Recorded By: MAT Pgs: 1
DEBBIE CONWAY
CLARK COUNTY RECORDER

Assessor Parcel Number: 191-13-811-052
File Number: R808634
Property Address: 2763 White Sage Dr
Henderson, NV 89052
Title Order Number: 39334 RS

NOTICE OF DEFAULT AND ELECTION TO SELL PURSUANT TO THE LIEN FOR DELINQUENT ASSESSMENTS

◆ IMPORTANT NOTICE ◆

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

WARNING! IF YOU FAIL TO PAY THE AMOUNT SPECIFIED IN THIS NOTICE, YOU COULD LOSE YOUR HOME, EVEN IF THE AMOUNT IS IN DISPUTE!

NOTICE IS HEREBY GIVEN: Red Rock Financial Services officially assigned as agent by the Sun City Anthem Community Association, under the Lien for Delinquent Assessments, recorded on 12/14/2012, in Book Number 20121214, as Instrument Number 0001338, reflecting GORDON B. HANSEN, TRUSTEE OF THE GORDON B. HANSEN TRUST, DATED AUGUST 22, 2008 as the owner(s) of record on said lien, land legally described as SUN CITY ANTHEM UNIT #19 PHASE 2 PLAT BOOK 102 PAGE 80 LOT 85 BLOCK 4, of the Official Records in the Office of the Recorder of Clark County, Nevada, makes known the obligation under the Covenants, Conditions and Restrictions recorded 10/31/2000, in Book Number 20001031, as Instrument Number 02253, has been breached. As of 07/01/2012 forward, all assessments, whether monthly or otherwise, late fees, interest, Association charges, legal fees and collection fees and costs, less any credits, have gone unpaid.

Above stated, the Association has equipped Red Rock Financial Services with verification of the obligation according to the Covenants, Conditions and Restriction in addition to documents proving the debt, therefore declaring any and all amounts secured as well as due and payable, electing the property to be sold to satisfy the obligation. In accordance with Nevada Revised Statutes 116, no sale date may be set until the ninety-first (91) day after the recorded date or the mailing date of the Notice of Default and Election to Sell. As of April 4, 2013, the amount owed is $2,752.66. This amount will continue to increase until paid in full.

Eungel M Watson Dated: April 4, 2013

Prepared By Eungel Watson Red Rock Financial Services, on behalf of Sun City Anthem Community Association

STATE OF NEVADA)
COUNTY OF CLARK)

On April 4, 2013, before me, personally appeared Eungel Watson, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Elizabeth Cernak

When Recorded Mail To: Red Rock Financial Services
4775 W. Teco Avenue, Suite 140
Las Vegas, Nevada 89118
702-932-6887

ELIZABETH CERNAK
Notary Public State of Nevada
No.04-91116-1
My appt. exp. July 25, 2016

RRFS
RED ROCK FINANCIAL SERVICES

June 25, 2013

The Gordon B. Hansen Trust, dated August 22, 2008
c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear The Gordon B. Hansen Trust, dated August 22, 2008 ,

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

This letter is being sent to you as a courtesy. As previously advised, Nevada Revised Statutes allow Red Rock Financial Services on behalf of the above referenced Association, to record a Notice of Sale Pursuant to the Lien for Delinquent Assessments. **The "Permission for Publication of Non-Judicial Foreclosure Sale" will be mailed to the Sun City Anthem Community Association Board of Directors for signature to publish the above property for sale in 30 DAYS.**

Your choice to not reinstate the above account has resulted in the recordation of the Lien for Delinquent Assessments and the Notice of Default and Election to Sell Pursuant to the Lien for Delinquent Assessments on the above referenced property, which was mailed to you via first class and certified mail.

Please contact Red Rock Financial Services office immediately to pay the account in full or to make alternate payment arrangements. If you choose not to reinstate the account, Red Rock Financial Services may have no other alternative but to mail the "Permission for Publication of Non-Judicial Foreclosure Sale" to the Board in 30 days. If the Board signs the Permission Form, Red Rock Financial Services will proceed with the preparation and recordation of the Notice of Sale Pursuant to the Lien for Delinquent Assessments.

If payment in full is not received or alternate payment arrangements are not made within 30 days from the date of this letter, the above account may have approximately $900.00 in collection fees and costs added to the account balance.

To reinstate your account, **you must contact Red Rock Financial Services to obtain "up to date" payoff figures.** Payment must be in the form of a **cashier's check** or **money order**. **Red Rock Financial Services does not accept personal checks.** Please ensure the account number is listed on any payments remitted to our office.

Additional information regarding this account can be obtained at www.rrfs.com. Please contact the office of Red Rock Financial Services at 888-299-3401 with any questions.

Regards,

Red Rock Financial Services

702.932.6887 | fax 702.341.7733 | 4775 W. Teco Avenue, Suite 140, Las Vegas, Nevada 89118 | www.rrfs.com

By sending your check, please be aware that you are authorizing Red Rock Financial Services to use the information on your check to make a one-time electronic debit from your account at the financial institution indicated on your check. This electronic debit will be for the amount of your check; no additional amount will be added to the amount. (If we cannot collect your electronic payment, we will issue a draft against your account.) Please contact the Accounts Receivable department at (702) 932-6887 to learn about other payment options should you prefer to not have your payment processed in this manner.

RRFS
RED ROCK FINANCIAL SERVICES

June 25, 2013

The Gordon B. Hansen Trust, dated August 22, 2008
c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear The Gordon B. Hansen Trust, dated August 22, 2008 ,

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If payment in full is not received or alternate payment arrangements are not made within 30 days from the date of this letter, the above account may have approximately $900.00 in collection fees and costs added to the account balance.

To reinstate your account, **you must contact Red Rock Financial Services to obtain "up to date" payoff figures.** Payment must be in the form of a **cashier's check** or **money order**. **Red Rock Financial Services does not accept personal checks.** Please ensure the account number is listed on any payments remitted to our office.

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Red Rock Financial Services

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RED ROCK FINANCIAL SERVICES

File Number: R 808034

MAILING AFFIDAVIT

STATE OF NEVADA)
COUNTY OF CLARK) Ss.
)

The declarant, whose signature appears below, and who is an employee of Red Rock Financial Services, states that he/she is now and at all times herein mentioned was, a citizen of the United States and over the age of eighteen (18) years; on the date as set forth below, he/she personally mailed the Notice, of which the annexed is a true copy, upon the addressee attached hereto, by depositing in the United States Mail in the County set forth above, an envelope, certified and first class with postage prepaid thereon, containing a copy of such Notice, addressed to the attached named person(s) at the address herein attached stated.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: 8/15/13

Signature Hallay Nigh

See Attached 2 Pages

Revised 4/13

RRFS
RED ROCK FINANCIAL SERVICES

FINAL NOTICE

August 15, 2013

Sent Certified and First Class Mail

The Gordon B. Hansen Trust, dated August 22, 2008
c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear The Gordon B. Hansen Trust, dated August 22, 2008 ,

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

This letter is being sent as a courtesy as we have attempted several times to contact you. The Association has requested that our office review and prepare the account for foreclosure for unpaid assessments. You must contact our office within 10 business days of the date of this letter to discuss arrangements for payment. Failure to contact our within the 10 business days may result in the immediate foreclosure sale of the property.

Additional information regarding this account can be obtained at www.rrfs.com. Please contact the office of Red Rock Financial Services at 888-299-3401 with any questions.

Regards,

Red Rock Financial Services

702.932.6887 | fax 702.341.7733 | 4775 W. Teco Avenue, Suite 140, Las Vegas, Nevada 89118 | www.rrfs.com

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RRFS
RED ROCK FINANCIAL SERVICES

FINAL NOTICE

August 15, 2013

Sent Certified and First Class Mail

The Gordon B. Hansen Trust, dated August 22, 2008
c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear The Gordon B. Hansen Trust, dated August 22, 2008 ,

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

This letter is being sent as a courtesy as we have attempted several times to contact you. The Association has requested that our office review and prepare the account for foreclosure for unpaid assessments. You must contact our office within 10 business days of the date of this letter to discuss arrangements for payment. Failure to contact our within the 10 business days may result in the immediate foreclosure sale of the property.

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Regards,

Red Rock Financial Services

702.932.6887 | fax 702.341.7733 | 4775 W. Teco Avenue, Suite 140, Las Vegas, Nevada 89118 | www.rrfs.com

By sending your check, please be aware that you are authorizing Red Rock Financial Services to use the information on your check to make a one-time electronic debit from your account at the financial institution indicated on your check. This electronic debit will be for the amount of your check; no additional amount will be added to the amount. (If we cannot collect your electronic payment, we will issue a draft against your account.)
Please contact the Accounts Receivable department at (702) 932-6887 to learn about other payment options should you prefer to not have your payment processed in this manner.

THE WALZ CERTIFIED MAILER™ FROM **WALZ™**

FORM #35663 VERSION: 01/18
U.S. PAT. NO. 5,501,393

7196 9008 9111 9954 0621

TO:

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052

SENDER:

REFERENCE:

R808634

Label #1

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052
R808634

Label #2

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052
R808634

Label #3

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052
R808634

TEAR ALONG THIS LINE

PS Form 3800, January 2005

RETURN RECEIPT SERVICE		
	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	

USPS®
Receipt for Certified Mail™
No Insurance Coverage Provided
Do Not Use for International Mail

POSTMARK OR DATE

Mailed on 8/15/13 by
Red Rock Financial Services
See Firm Book

FOLD AND TEAR THIS WAY ⟶ OPTIONAL

Certified Article Number
7196 9008 9111 9954 0621
SENDERS RECORD

Label #5

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052
R808634

Charge Amount:

Charge To:

FOLD AND TEAR THIS WAY ⟶

Label #6

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL™

7196 9008 9111 9954 0621

Thank you for using Return Receipt Service

RETURN RECEIPT REQUESTED
USPS® MAIL CARRIER
DETACH ALONG PERFORATION

2. Article Number

7196 9008 9111 9954 0621

3. Service Type **CERTIFIED MAIL™**

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

1. Article Addressed to:

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052
R808634 Sun City Anthem Community Association

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery

C. Signature

X

☐ Agent
☐ Addressee

D. Is delivery address different from item 1?
If YES, enter delivery address below:

☐ Yes
☐ No

Thank you for using Return Receipt Service

PS Form 3811, January 2005 Domestic Return Receipt

AA 000739

SCA000488

THE WALZ CERTIFIED MAILER™ FROM **WALZ™**

FORM #35663 VERSION: 01/13
U.S. PAT. NO. 5,501,393

7196 9008 9111 9954 0614

Label #1

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634

Label #2

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634

Label #3

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634

FOLD AND TEAR THIS WAY → OPTIONAL

TEAR ALONG THIS LINE

TO:

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052

SENDER:

REFERENCE:

R808634

PS Form 3800, January 2005

RETURN RECEIPT SERVICE		
	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	

USPS®
Receipt for Certified Mail™
No Insurance Coverage Provided
Do Not Use for International Mail

POSTMARK OR DATE

Mailed on 8/15/13 by
Red Rock Financial Services
See Firm Book

Certified Article Number

7196 9008 9111 9954 0614

SENDERS RECORD

Label #5

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634

Charge Amount:

Charge To:

FOLD AND TEAR THIS WAY →

Label #6

PEEL STICKER AT TOP OF ENVELOPE TO THE RIGHT OF RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL™

7196 9008 9111 9954 0614

Thank you for using Return Receipt Service

RETURN RECEIPT REQUESTED
USPS® MAIL CARRIER
DETACH ALONG PERFORATION

2. Article Number

7196 9008 9111 9954 0614

3. Service Type CERTIFIED MAIL™

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

1. Article Addressed to:

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634 Sun City Anthem Community Association

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) | B. Date of Delivery

C. Signature
X ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

PS Form 3811, January 2005 Domestic Return Receipt

Thank you for using Return Receipt Service

AA 000736

SCA000489

THE WALZ CERTIFIED MAILER™ FROM **WALZ™** U.S. PAT. NO. 5,501,393

7196 9008 9111 1347 9402

Label #1

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052
R808634

Label #2

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052
R808634

Label #3

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052
R808634

TO:

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052

SENDER:

REFERENCE:

R808634

TEAR ALONG THIS LINE

PS Form 3800, January 2005

RETURN RECEIPT SERVICE		
	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	

USPS®
Receipt for Certified Mail™
No Insurance Coverage Provided
Do Not Use for International Mail

POSTMARK OR DATE

Mailed on 1/29/14 by
Red Rock Financial Services
See Firm Book

FOLD AND TEAR THIS WAY ⟶ OPTIONAL

Certified Article Number
7196 9008 9111 1347 9402
SENDERS RECORD

Label #5

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052
R808634

Charge Amount:

Charge To:

Label #6

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF RETURN ADDRESS. FOLD AT DOTTED LINE.

CERTIFIED MAIL™

7196 9008 9111 1347 9402

FOLD AND TEAR THIS WAY ⟶

Thank you for using Return Receipt Service

RETURN RECEIPT REQUESTED
USPS® MAIL CARRIER
DETACH ALONG PERFORATION

2. Article Number

7196 9008 9111 1347 9402

3. Service Type CERTIFIED MAIL™

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

1. Article Addressed to:

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052
R808634 Sun City Anthem Community Association

COMPLETE THIS SECTION ON DELIVERY

A Received by (Please Print Clearly) | B. Date of Delivery

C Signature
X ☐ Agent ☐ Addressee

D Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

Thank you for using Return Receipt Service

PS Form 3811, January 2005 Domestic Return Receipt

AA 000730

SCA000392

RRFS
RED ROCK FINANCIAL SERVICES

4775 W. Teco Avenue, Suite 140
Las Vegas, NV 89118

FINAL NOTICE

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052
R808634

NIXIE 891 7E 1009 08/19/13
RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD
BC: 89118436646 *0879-06874-15-44

89118436646

SCA000403

AA 000738

RED ROCK FINANCIAL SERVICES

MAILING AFFIDAVIT

File Number: R8086634

STATE OF NEVADA)
) Ss.
COUNTY OF CLARK)

The declarant, whose signature appears below, and who is an employee of Red Rock Financial Services, states that he/she is now and at all times herein mentioned was, a citizen of the United States and over the age of eighteen (18) years; on the date as set forth below, he/she personally mailed the Notice, of which the annexed is a true copy, upon the addressee attached hereto, by depositing in the United States Mail in the County set forth above, an envelope, certified and first class with postage prepaid thereon, containing a copy of such Notice, addressed to the attached named person(s) at the address herein attached stated.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: 1/29/14

Signature [illegible]

See Attached 2 Pages

Revised 4/3/08

THE WALZ CERTIFIED MAILER™ FROM **WALZ™** U.S. PAT. NO. 6,501,393

7196 9008 9111 1347 9396

Label #1

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634

Label #2

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634

Label #3

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634

TEAR ALONG THIS LINE

TO:

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052

SENDER:

REFERENCE:

R808634

PS Form 3800, January 2005

RETURN RECEIPT SERVICE		
	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	

USPS®
Receipt for Certified Mail™
No Insurance Coverage Provided
Do Not Use for International Mail

POSTMARK OR DATE

Mailed on 1/29/14 by
Red Rock Financial Services
See Firm Book

FOLD AND TEAR THIS WAY ⟶ OPTIONAL

Certified Article Number
7196 9008 9111 1347 9396
SENDERS RECORD

Label #5

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634

Charge Amount:

Charge To:

FOLD AND TEAR THIS WAY ⟶

Label #6

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL™

7196 9008 9111 1347 9396

Thank you for using Return Receipt Service

RETURN RECEIPT REQUESTED
USPS® MAIL CARRIER
DETACH ALONG PERFORATION

2. Article Number

7196 9008 9111 1347 9396

3. Service Type **CERTIFIED MAIL™**

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

1. Article Addressed to:

The Gordon B Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634 Sun City Anthem Community Association

COMPLETE THIS SECTION ON DELIVERY

A Received by (Please Print Clearly) | B. Date of Delivery

C Signature
X ☐ Agent ☐ Addressee

D Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

Thank you for using Return Receipt Service

AA 000740

PS Form 3811, January 2005 Domestic Return Receipt

SCA000393

RRFS
RED ROCK FINANCIAL SERVICES

FINAL NOTICE

January 29, 2014

Sent Certified and First Class Mail

The Gordon B. Hansen Trust, dated August 22, 2008
c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear The Gordon B. Hansen Trust, dated August 22, 2008 ,

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Regards,

Red Rock Financial Services

702.932.6887 | fax 702.341.7733 | 4775 W. Teco Avenue, Suite 140, Las Vegas, Nevada 89118 | www.rrfs.com

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RRFS
RED ROCK FINANCIAL SERVICES

FINAL NOTICE

January 29, 2014

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Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear The Gordon B. Hansen Trust, dated August 22, 2008 ,

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

This letter is being sent as a courtesy as we have attempted several times to contact you. The Association has requested that our office review and prepare the account for foreclosure for unpaid assessments. You must contact our office within 10 business days of the date of this letter to discuss arrangements for payment. Failure to contact our office within the 10 business days may result in the immediate foreclosure sale of the property.

Additional information regarding this account can be obtained at www.rrfs.com. Please contact the office of Red Rock Financial Services at 888-299-3401 with any questions.

Regards,

Red Rock Financial Services

702.932.6887 | fax 702.341.7733 | 4775 W. Teco Avenue, Suite 140, Las Vegas, Nevada 89118 | www.rrfs.com

By sending your check, please be aware that you are authorizing Red Rock Financial Services to use the information on your check to make a one time electronic debit from your account at the financial institution indicated on your check. This electronic debit will be for the amount of your check, an additional amount will be added to the amount. (If you choose to elect your electronic payment, we will issue a loan against your account.) Please contact the Accounts Receivable department at (702) 932-6887 to learn about other payment options should you prefer to not have your payment processed in this manner.

2. Article Number

7196 9008 9111 1347 9396

3. Service Type **CERTIFIED MAIL™**

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

1. Article Addressed to:

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634 Sun City Anthem Community Association

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery

C. Signature

X

☐ Agent
☐ Addressee

D. Is delivery address different from item 1?
If YES, enter delivery address below:

☐ Yes
☐ No

PS Form 3811, January 2005 Domestic Return Receipt

808634

NOS Sent to Homeowner

2/11/2014

RED ROCK FINANCIAL SERVICES

MAILING AFFIDAVIT

File Number: R 808634

STATE OF NEVADA)
) Ss.
COUNTY OF CLARK)

The declarant, whose signature appears below, and who is an employee of Red Rock Financial Services, states that he/she is now and at all times herein mentioned was, a citizen of the United States and over the age of eighteen (18) years; on the date as set forth below, he/she personally mailed the Notice, of which the annexed is a true copy, upon the addressee attached hereto, by depositing in the United States Mail in the County set forth above, an envelope, certified and first class with postage prepaid thereon, containing a copy of such Notice, addressed to the attached named person(s) at the address herein attached stated.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: 2/11/14

Signature [illegible]

See Attached 9 Pages

Revised 4/3/08

THE WALZ CERTIFIED MAILER™

FROM **WALZ™**

U.S. PAT. NO. 5,501,393

7196 9008 9111 1346 5894

Label #1

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634

Label #2

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634

Label #3

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634

FOLD AND TEAR THIS WAY ⟶ OPTIONAL

TEAR ALONG THIS LINE

TO:

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052

SENDER:

REFERENCE:

R808634

PS Form 3800, January 2005

RETURN RECEIPT SERVICE		
	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	

USPS®
Receipt for Certified Mail™
No Insurance Coverage Provided
Do Not Use for International Mail

POSTMARK OR DATE

Mailed on 2/12/14 by
Red Rock Financial Services
See Firm Book

Certified Article Number

7196 9008 9111 1346 5894

SENDERS RECORD

Label #5

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634

Charge Amount:

Charge To:

FOLD AND TEAR THIS WAY ⟶

Label #6

PLACE SEPARATOR OF ENVELOPE TO THE LEFT OF RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL™

7196 9008 9111 1346 5894

Thank you for using Return Receipt Service

RETURN RECEIPT REQUESTED
USPS® MAIL CARRIER
DETACH ALONG PERFORATION

2. Article Number

7196 9008 9111 1346 5894

3. Service Type **CERTIFIED MAIL™**

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

1. Article Addressed to:

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634 Sun City Anthem Community Association

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery

C. Signature

X

☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

Thank you for using Return Receipt Service

PS Form 3811, January 2005 Domestic Return Receipt

AA 000740

SCA000361

THE WALZ CERTIFIED MAILER™ FROM **WALZ™** U.S. PAT. NO. 5,501,393

7196 9008 9111 1346 5900

Label #1

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052
R808634

Label #2

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052
R808634

Label #3

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052
R808634

TEAR ALONG THIS LINE

TO:

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052

SENDER:

REFERENCE:

R808634

PS Form 3800, January 2005

RETURN RECEIPT SERVICE		
	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	

USPS®
Receipt for Certified Mail™ Red
No Insurance Coverage Provided
Do Not Use for International Mail

POSTMARK OR DATE

Mailed on 2/12/14 by
Rock Financial Services
See Firm Book

FOLD AND TEAR THIS WAY → OPTIONAL

Certified Article Number

7196 9008 9111 1346 5900

SENDERS RECORD

Label #5

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052
R808634

Charge Amount:

Charge To:

FOLD AND TEAR THIS WAY →

Label #6

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL

7196 9008 9111 1346 5900

Thank you for using Return Receipt Service

RETURN RECEIPT REQUESTED
USPS® MAIL CARRIER
DETACH ALONG PERFORATION

2. Article Number

7196 9008 9111 1346 5900

3. Service Type **CERTIFIED MAIL™**

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

1. Article Addressed to:

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2763 White Sage Drive
Henderson, NV 89052
R808634 Sun City Anthem Community Association

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) | B. Date of Delivery

C. Signature

X ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

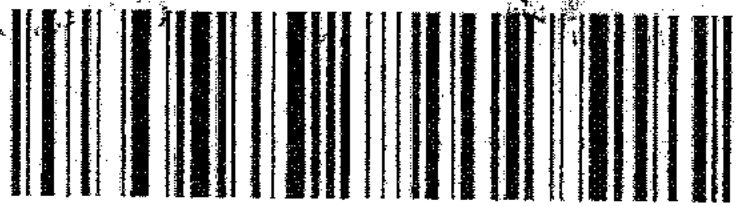
Thank you for using Return Receipt Service

AA 000747

PS Form 3811, January 2005 Domestic Return Receipt

SCA000360

2. Article Number



7196 9008 9111 1346 5894

3. Service Type **CERTIFIED MAIL™**

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

1. Article Addressed to:

The Gordon B. Hansen Trust, dated August 22, 2008

c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052
R808634 Sun City Anthem Community Association

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery

C. Signature

X

☐ Agent
☐ Addressee

D. Is delivery address different from item 1?
If YES, enter delivery address below:

☐ Yes
☐ No

FEB 13 2009

PS Form 3811, January 2005 Domestic Return Receipt

SCA000187

EXHIBIT 13

808634

Priority Posting Confirmations

2/14/2014

AA 000750

RRFS
RED ROCK FINANCIAL SERVICES

PERMISSION FOR PUBLICATION OF FORECLOSURE SALE
AND
AUTHORITY TO CONDUCT FORECLOSURE SALE

January 3, 2014

RE: 2763 White Sage Dr. Henderson, NV 89052
Sun City Anthem Community Association / R808634

The Board of Directors of Sun City Anthem Community Association, hereby give permission to, authorize and direct Red Rock Financial Services, as agent for Sun City Anthem Community Association, to proceed forward with the collection process and set a date of foreclosure, post and publish the foreclosure date, and conduct the foreclosure sale for the property commonly known and described as 2763 White Sage Dr. Henderson, NV 89052. At any time prior to the foreclosure sale, the Association may instruct Red Rock, in writing, to postpone or cancel the foreclosure sale of the above referenced property. In addition, Red Rock Financial Services may postpone the sale if deemed reasonably necessary without specific instruction or authorization from the Board of Directors.

The Board of Directors also expressly understand that if the Association takes title of the property through the foreclosure sale, the Association will be responsible for all collection fees and costs associated to the collection and the sale of the above referenced property. All fees and costs will be paid in accordance with the approved collection contract with Red Rock Financial Services. Red Rock Financial Services will provide the Association with a Trustee's Deed upon Sale (without warranty) for signature and recording after the foreclosure sale.

The Board of Directors acknowledges that the foreclosure sale will result in the transfer of title of the property from the existing homeowner. The Board of Directors agree that in the event that the homeowner makes any claim regarding the loss of its property through this foreclosure action, the Association shall have the exclusive duty to defend and to pay all defense costs of all such claims, provided that in the event that such claims are determined by a Court of law to be the sole error of Red Rock Financial Services, Red Rock Financial Services shall immediately reimburse the Association of all costs and expenses of such claim.

RECEIVED
JAN 3 2014
RRFS

Executed On: 01/07/14

Signed: _____
Signature of Board Member

DANIEL KURLEPON
Printed Name of Board Member

702.932.6887 | fax 702.341.7733 | 4775 W. Teco Avenue, Suite 140, Las Vegas, Nevada 89118 | www.rrfs.com

Priority Posting & Publishing
Order # P1082780
TS # R808634

AFFIDAVIT OF SERVICE

State of Nevada)
County of Clark)

I, Annette Miller, state:

That at all times herein I have been a citizen of the United States, over 18 years of age, and am not a party to, or interested in, the proceeding in which this affidavit is made.

I served **Gordon B. Hansen, Trustee** with a copy of the Notice of Sale, on 2/13/2014 at approximately 7:02 PM, by:

Attempting to personally serve the person(s) residing at the property, however no one answered the door. I thereafter posted a copy of the Notice of Sale on the property in the manner prescribed pursuant to NRS 116.311635, in a conspicuous place on the property, which is located at:

2763 White Sage Drive
Henderson NV 89052

To the best of my knowledge, the property is vacant and unoccupied.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

Dated 2/13/2014

Nevada Legal Support Services LLC

Annette Miller, 3036990
930 S. 4th Street, Suite 200
Las Vegas, NV 89101
(702) 382-2747
NV License #1711

NVLSS ID# 475490 69
COUNTY OF SERVICE: CLARK
SERVER: Annette Miller

Priority Posting & Publishing
Order # P1082780
TS # R808634

AFFIDAVIT OF POSTING NOTICE OF SALE

State of Nevada)
County of Clark)

I, Jessica Pruett, state:

That at all times herein I have been a citizen of the United States, over 18 years of age, and am not a party to, or interested in, the proceeding in which this affidavit is made.

On 2/13/2014, I posted a copy of the Notice of Sale pursuant to NRS 116.311635, concerning Sale R808634, in a public place in the county where the property is situated, to wit:

NEVADA LEGAL NEWS, 930 S FOURTH ST, LAS VEGAS
CLARK COUNTY COURTHOUSE, 200 LEWIS ST, LAS VEGAS
CLARK COUNTY BUILDING, 309 S THIRD ST, LAS VEGAS

The purported owner and address of the property contained in the Notice of Sale being:

Gordon B. Hansen, Trustee, 2763 White Sage Drive, Henderson NV 89052.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

Dated 2/13/2014

Nevada Legal Support Services LLC

Jessica Pruett

Jessica Pruett
930 S. 4th Street, Suite 200
Las Vegas, NV 89101
(702) 382-2747
NV License #1711

NVLSS ID# 475490 69
COUNTY OF SERVICE: CLARK
SERVER: Jessica Pruett
RED ROCK FINANCIAL SERVICES

Priority Posting & Publishing
Order # P1082780
TS # R808634

AFFIDAVIT OF POSTING NOTICE OF SALE

State of Nevada)
County of Clark)

I, Annette Miller, state:

That at all times herein I have been a citizen of the United States, over 18 years of age, and am not a party to, or interested in, the proceeding in which this affidavit is made.

On 2/13/2014, I posted a copy of the Notice of Sale pursuant to NRS 116.311635, concerning Sale R808634, in a public place in the county where the property is situated, to wit:

CITY HALL, 240 WATER ST, HENDERSON
PASEO VERDE LIBRARY, 280 S GREEN VALLEY PKWY, HENDERSON
LIBRARY, 100 WEST LAKE MEAD BLVD, HENDERSON

The purported owner and address of the property contained in the Notice of Sale being:

Gordon B. Hansen, Trustee, 2763 White Sage Drive, Henderson NV 89052.

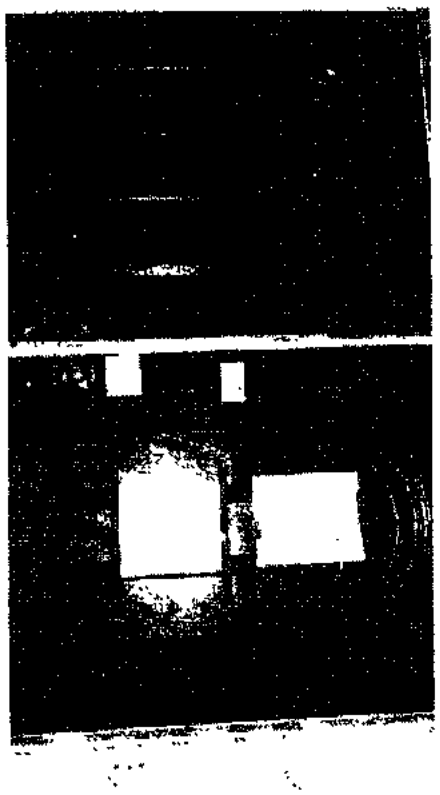
I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

Dated 2/13/2014

Nevada Legal Support Services LLC

Annette Miller
930 S. 4th Street, Suite 200
Las Vegas, NV 89101
(702) 382-2747
NV License #1711

NVLSS ID# 475490 69
COUNTY OF SERVICE: CLARK
SERVER: Annette Miller
RED ROCK FINANCIAL SERVICES



Photos taken by: Annette Miller County: CLARK 36
Photo Date: 2/13/2014 Time: 7:02 PM NLN ID# 475490 Page 1 of 1
Primary Borrower: Gordon B. Hansen, Trustee
Property Address: 2763 White Sage Drive, Henderson NV 89052

Nevada Legal Support Services LLC
930 S. 4th Street, Suite 200
Las Vegas, NV 89101
(702) 382-2747 NV. Lic. #1711

Priority Posting & Publishing Order # P1082780 TS#R808634

808634

Priority Posting Confirmations

3/3/2014

AFFP

P1082780

RECEIVED FEB 28 2014 RRFS

Affidavit of Publication

STATE OF NEVADA)
COUNTY OF CLARK) SS

I, Rosalie Qualls state:

That I am Assistant Operations Manager of the Nevada Legal News, a daily newspaper of general circulation, printed and published in Las Vegas, Clark County, Nevada; that the publication, a copy of which is attached hereto, was published in the said newspaper on the following dates:

Feb 14, 2014
Feb 21, 2014
Feb 28, 2014

That said newspaper was regularly issued and circulated on those dates. I declare under penalty of perjury that the foregoing is true and correct.

DATED: Feb 28, 2014

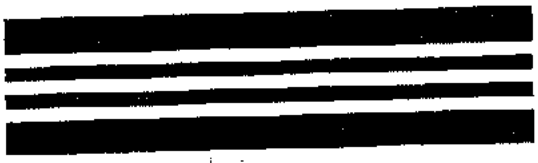
Rosalie Qualls

04108130 00369093

PRIORITY POSTING & PUBLISHING (2014)
17501 IRVINE BLVD. SUITE 1
TUSTIN, CA 92780

Assessor Parcel Number: 191-13-611-052 File Number: R608634 Property Address: 2763 White Sage Dr Henderson, NV 89052 NOTICE OF FORECLOSURE SALE UNDER THE LIEN FOR DELINQUENT ASSESSMENTS Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose. WARNING! A SALE OF YOUR PROPERTY IS IMMINENT! UNLESS YOU PAY THE AMOUNT SPECIFIED IN THIS NOTICE BEFORE THE SALE DATE, YOU COULD LOSE YOUR HOME. EVEN IF THE AMOUNT IS IN DISPUTE, YOU MUST ACT BEFORE THE SALE DATE. IF YOU HAVE ANY QUESTIONS, PLEASE CALL RED ROCK FINANCIAL SERVICES AT (702) 932-6887 or (702) 215-8130. IF YOU NEED ASSISTANCE, PLEASE CALL THE FORECLOSURE SECTION OF THE OMBUDSMAN'S OFFICE, NEVADA REAL ESTATE DIVISION AT (877) 829-9907 IMMEDIATELY. Red Rock Financial Services officially assigned as agent by the Sun City Anthem Community Association under the Lien for Delinquent Assessments. YOU ARE IN DEFAULT UNDER THE LIEN FOR DELINQUENT ASSESSMENTS, recorded on 12/14/2012 in Book Number 20121214 as Instrument Number 0001336 reflecting GORDON B. HANSEN, TRUSTEE OF THE GORDON B. HANSEN TRUST, DATED AUGUST 22, 2006 as the owner(s) of record on said lien. UNLESS YOU TAKE ACTION TO PROTECT YOUR PROPERTY, IT MAY BE SOLD AT A PUBLIC SALE. If you need an explanation of the nature of the proceedings against you, you should contact an attorney. The Notice of Default and Election to Sell Pursuant to the Lien for Delinquent Assessments was recorded on 04/08/2013 in Book Number 20130408 as Instrument Number 0001087 of the Official Records in the Office of the Recorder. NOTICE IS HEREBY GIVEN: That on 03/07/2014, at 10:00 a.m. at the front entrance of the Nevada Legal News located at 930 South Fourth Street, Las Vegas, NV 89101, that the property commonly known as 2763 White Sage Dr, Henderson, NV 89052 and land legally described as SUN CITY ANTHEM UNIT #19 PHASE 2 PLAT BOOK 102 PAGE 80 LOT 85 BLOCK 4 of the Official Records in the Office of the County Recorder of Clark County, Nevada, will sell at public auction to the highest bidder, for cash payable at the time of sale in lawful money of the United States, by cash, a cashier's check drawn by a state or national bank, a cashier's check drawn by a state or federal credit union, state or federal savings and loan association or savings association authorized to do business in the State of Nevada. in the amount of $5,081.45 as of 2/11/2014, which includes the total amount of the unpaid balance and reasonably estimated costs, expenses and advances at the time of the initial publication of this notice. Any subsequent Association assessments, late fees interest, expenses or advancements, if any, of the Association or its Agent, under the terms of the Lien for Delinquent Assessments shall continue to accrue until the date of the sale. The property heretofore described is being sold "as is". The sale will be made without covenant or warranty, expressed or implied regarding, but not limited to, title or possession, encumbrances, obligations to satisfy any secured or unsecured liens or against all right, title and interest of the owner, without equity or right of redemption to satisfy the indebtedness secured by said Lien, with interest thereon, as provided in the Declaration of Covenants, Conditions and Restrictions, recorded on 10/31/2000, in Book Number 20001031, as Instrument Number 02263 of the Official Records in the Office of the Recorder and any subsequent amendments or updates that may have been recorded. Dated: February 11, 2014 Prepared By Christie Marling, Red Rock Financial Services, on behalf of Sun City Anthem Community Association Reinstatement Information: (702) 483-2996 or Sale Information: (714) 573-7777 When Recorded Mail To: Red Rock Financial Services 4775 W. Teco Avenue, Suite 140 Las Vegas, NV 89118 (702) 483-2996 or (702) 932-6887 P1082780 2/14, 2/21, 02/28/2014

EXHIBIT 14



808634

PAYOFF DEMAND SENT

12/20/2012

Red Rock Financial Services

Numbers of Pages 6

December 20, 2012

Ticor Title
Attn: Brennan Farmer
Via Email: brennan.farmer@ticortitle.com

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634
Escrow Number: 12163955

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

In response to your request for payoff figures for the above reference account, the following accounting ledger is a breakdown for the payoff request.

The current balance is $1,380.60. This demand and its balance due will expire on 1/8/13. You MUST request an update as this balance will only be valid through the date above. Payment received after the expiration date will not be accepted if the balance has changed. Failure to remit the balance by the expiration date may result in the continuation of the collection process at an additional cost. Check(s) should be made payable to Red Rock Financial Services and mailed to the address below.

Sun City Anthem Community Association and/or the management company's set up fees, as well as other fees and costs that are due at closing, if any, such as future assessments, are not included. You must contact RMI Management directly at www.rmillc.com to request their demand statement for those additional amounts prior to closing.

If you have any questions, please contact our office at 702-932-6887.

Regards,

Red Rock Financial Services

Red Rock Financial Services ■ 7251 Amigo Street, Suite 100 Las Vegas, NV 89119

www.rrfs.com ■ Phone: 702-932-6887 Toll Free: 888-319-9460 Fax: 702.341.7733

By sending your check, please be aware that you are authorizing Red Rock Financial Services to use the information on your check to make a one-time electronic debit from your account at the financial institution indicated on your check. This electronic debit will be for the amount of your check; no additional amount will be added to the amount. (If we cannot collect your electronic payment, we will issue a draft against your account.) Please contact the Accounts Receivable department at (702) 932-6887 to learn about other payment options should you prefer to not have your payment processed in this manner.

Jason Cernak

From: Jason Cernak
Sent: Thursday, December 20, 2012 4:32 PM
To: brennan.farmer@ticortitle.com
Cc: Elizabeth Cernak
Subject: 2763 white sage dr
Attachments: 808634_20121220162343.pdf

Good afternoon,
I've attached the payoff demand you requested for the above mentioned property.

Thank you,

Jason Cernak
Finance and Accounting
Red Rock Financial Services
o. 702.932.6887 | f. 702.341.7733 | www.RRFS.com

RRFS
RED ROCK FINANCIAL SERVICES
A FirstService Residential Management Company
Click to follow RRFS!

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.
CONFIDENTIALITY NOTICE: This e-mail message, including any attachments, may contain information that is confidential and/or proprietary. If you are not an intended recipient, please be advised that any review, use, reproduction or distribution of this message is prohibited. If you have received this message in error, please notify the sender immediately by return e-mail and delete/destroy the message and any copies thereof.

Red Rock Financial Services
Account Detail
Sun City Anthem Community Association

Information as of: December 20, 2012

Red Rock Financial Services Account Number: R808634
Property Address: 2763 White Sage Dr, Henderson, NV 89052
The Gordon B. Hansen Trust, dated August 22, 2008,

Detailed Summary

Date	Description	Amount	Balance	Check#
01/01/2006	Quarterly Assessment	$235.00	$235.00	
02/01/2006	Association Mgmt Payment	-$235.00	$0.00	
04/01/2006	Quarterly Assessment	$235.00	$235.00	
04/18/2006	Association Mgmt Payment	-$235.00	$0.00	
07/01/2006	Quarterly Assessment	$235.00	$235.00	
07/12/2006	Association Mgmt Payment	-$235.00	$0.00	
10/01/2006	Quarterly Assessment	$235.00	$235.00	
10/26/2006	Association Mgmt Payment	-$235.00	$0.00	
01/01/2007	Quarterly Assessment	$235.00	$235.00	
01/11/2007	Association Mgmt Payment	-$235.00	$0.00	
03/08/2007	Association Mgmt Payment	-$235.00	-$235.00	
04/01/2007	Quarterly Assessment	$235.00	$0.00	
06/08/2007	Association Mgmt Payment	-$235.00	-$235.00	
07/01/2007	Quarterly Assessment	$235.00	$0.00	
10/01/2007	Sun City Anthem QT Assmt	$235.00	$235.00	
10/11/2007	Association Mgmt Payment	-$235.00	$0.00	1873
01/01/2008	Sun City Anthem QT Assmt	$275.00	$275.00	
01/11/2008	Association Mgmt Payment	-$275.00	$0.00	6761
03/01/2008	Special Assessment	-$81.32	-$81.32	
03/01/2008	Special Assessment	$81.32	$0.00	
04/01/2008	Sun City Anthem QT Assmt	$275.00	$275.00	
04/08/2008	Association Mgmt Payment	-$275.00	$0.00	3313
06/01/2008	Unit Repair	$81.32	$81.32	
06/25/2008	Association Mgmt Payment	-$81.32	$0.00	2044
07/01/2008	Sun City Anthem QT Assmt	$275.00	$275.00	

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Red Rock Financial Services
Account Detail
Sun City Anthem Community Association

Information as of: December 20, 2012

Red Rock Financial Services Account Number: R808634
Property Address: 2763 White Sage Dr, Henderson, NV 89052
The Gordon B. Hansen Trust, dated August 22, 2008,

Detailed Summary

Date	Description	Amount	Balance	Check#
07/11/2008	Association Mgmt Payment	-$275.00	$0.00	6578
09/25/2008	Association Mgmt Payment	-$175.00	-$175.00	02057
10/01/2008	Sun City Anthem QT Assmt	$175.00	$0.00	
12/31/2008	Association Mgmt Payment	-$240.00	-$240.00	02074
01/01/2009	Sun City Anthem QT Assmt	$240.00	$0.00	
04/01/2009	Sun City Anthem QT Assmt	$240.00	$240.00	
04/07/2009	Association Mgmt Payment	-$240.00	$0.00	02090
07/01/2009	Sun City Anthem QT Assmt	$240.00	$240.00	
07/13/2009	Association Mgmt Payment	-$240.00	$0.00	23791
10/09/2009	Association Mgmt Payment	-$240.00	-$240.00	97004
01/01/2010	Sun City Anthem QT Assmt	$240.00	$0.00	
01/25/2010	Association Mgmt Payment	-$240.00	-$240.00	10803
04/01/2010	Sun City Anthem QT Assmt	$240.00	$0.00	
07/01/2010	Sun City Anthem QT Assmt	$240.00	$240.00	
07/30/2010	Late Fee	$25.00	$265.00	
08/16/2010	Association Mgmt Payment	-$265.00	$0.00	63164
10/07/2010	Association Mgmt Payment	-$240.00	-$240.00	98965
01/01/2011	Sun City Anthem QT Assmt	$250.00	$10.00	
02/18/2011	Association Mgmt Payment	-$10.00	$0.00	84899
04/01/2011	Sun City Anthem QT Assmt	$250.00	$250.00	
04/30/2011	Late Fee	$25.00	$275.00	
05/20/2011	Association Mgmt Payment	-$275.00	$0.00	02215
07/01/2011	Sun City Anthem QT Assmt	$250.00	$250.00	
07/30/2011	Late Fee	$25.00	$275.00	
08/18/2011	Association Mgmt Payment	-$275.00	$0.00	02227

Red Rock Financial Services
Account Detail
Sun City Anthem Community Association

Information as of: December 20, 2012

Red Rock Financial Services Account Number: R808634
Property Address: 2763 White Sage Dr, Henderson, NV 89052
The Gordon B. Hansen Trust, dated August 22, 2008,

Detailed Summary

Date	Description	Amount	Balance	Check#
10/01/2011	Sun City Anthem QT Assmt	$250.00	$250.00	
10/11/2011	Association Mgmt Payment	-$240.00	$10.00	52791
11/22/2011	Association Mgmt Payment	-$10.00	$0.00	61105
01/01/2012	Sun City Anthem QT Assmt	$275.00	$275.00	
01/30/2012	Late Fee	$25.00	$300.00	
02/21/2012	Association Mgmt Payment	-$300.00	$0.00	00112
04/01/2012	Sun City Anthem QT Assmt	$275.00	$275.00	
04/26/2012	Association Mgmt Payment	-$275.00	$0.00	127
07/01/2012	Sun City Anthem QT Assmt	$275.00	$275.00	
07/31/2012	Late Fee	$25.00	$300.00	
08/31/2012	Late Fee	$25.00	$325.00	
09/13/2012	Management Company Collection Cost	$150.00	$475.00	
09/17/2012	Intent to Lien Letter	$125.00	$600.00	
09/17/2012	Intent Mailing Costs	$8.97	$608.97	
09/17/2012	Intent Mailing Costs	$8.97	$617.94	
09/24/2012	Vendor Adjustment	-$150.00	$467.94	
09/30/2012	Late Fee	$25.00	$492.94	
09/30/2012	Interest	$1.21	$494.15	
10/01/2012	Sun City Anthem QT Assmt	$275.00	$769.15	
10/18/2012	Red Rock Partial Payment	-$300.00	$469.15	PC 143
10/30/2012	Association Interest	$1.21	$470.36	
10/31/2012	Late Fee	$25.00	$495.36	
11/29/2012	Association Interest	$2.42	$497.78	
11/30/2012	Late Fee	$25.00	$522.78	

Red Rock Financial Services
Account Detail
Sun City Anthem Community Association

Information as of: December 20, 2012

Red Rock Financial Services Account Number: R808634
Property Address: 2763 White Sage Dr, Henderson, NV 89052
The Gordon B. Hansen Trust, dated August 22, 2008,

Detailed Summary

Date	Description	Amount	Balance	Check#
12/05/2012	Lien Recording Costs	$34.00	$556.78	
12/05/2012	Lien Release	$30.00	$586.78	
12/05/2012	Lien for Delinquent Assessment	$325.00	$911.78	
12/05/2012	Lien Mailing Costs	$8.20	$919.98	
12/05/2012	Lien Mailing Costs	$8.20	$928.18	
12/20/2012	Payoff Demand	$150.00	$1,078.18	
12/30/2012	Association Interest	$2.42	$1,080.60	
12/31/2012	late fee	$25.00	$1,105.60	
1/1/2013	assessment	$275.00	$1,380.60	

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Printed: 12/20/12

Red Rock Financial Services

Inst #: 201212140001338
Fees: $17.00
N/C Fee: $0.00
12/14/2012 09:37:58 AM
Receipt #: 1421501
Requestor:
NORTH AMERICAN TITLE COMPAN
Recorded By: MSH Pgs: 1
DEBBIE CONWAY
CLARK COUNTY RECORDER

Assessor Parcel Number: 191-13-811-052
File Number: R808634

Accommodation

LIEN FOR DELINQUENT ASSESSMENTS

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

NOTICE IS HEREBY GIVEN: Red Rock Financial Services, a division of RMI Management LLC, officially assigned as agent by the Sun City Anthem Community Association, herein also called the Association, in accordance with Nevada Revised Statues 116 and outlined in the Association Covenants, Conditions, and Restrictions, herein also called CC&R's, recorded on 10/31/2000, in Book Number 20001031, as Instrument Number 02253 and including any and all Amendments and Annexations et. seq., of Official Records of Clark County, Nevada, which have been supplied to and agreed upon by said owner.

Said Association imposes a Lien for Delinquent Assessments on the commonly known property:
2763 White Sage Dr, Henderson, NV 89052
SUN CITY ANTHEM UNIT #19 PHASE 2 PLAT BOOK 102 PAGE 80 LOT 85 BLOCK 4, in the County of Clark

Current Owner(s) of Record:
GORDON B. HANSEN, TRUSTEE OF THE GORDON B. HANSEN TRUST, DATED AUGUST 22, 2008

The amount owing as of the date of preparation of this lien is **$925.76.
This amount includes assessments, late fees, interest, fines/violations and collection fees and costs.
** The said amount may increase or decrease as assessments, late fees, interest, fines/violations, collection fees, costs or partial payments are applied to the account.

Dated: December 5, 2012

Rebecca Tom

Prepared By Rebecca Tom, Red Rock Financial Services, on behalf of Sun City Anthem Community Association

STATE OF NEVADA)
COUNTY OF CLARK)

On December 5, 2012, before me, personally appeared Rebecca Tom, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Meryl R. Fisher

MERYL R. FISHER
Notary Public State of Nevada
No. 12-7488-1
My appt. exp. Apr. 20, 2016

When Recorded Mail To: Red Rock Financial Services
7251 Amigo Street, Suite 100
Las Vegas, Nevada 89119
702-932-6887

808634

PAYOFF DEMAND UPDATE SENT

1/16/2013

Red Rock Financial Services

Numbers of Pages 6

January 16, 2013

Ticor Title
Attn: Brennan Farmer
Via Email: brennan.farmer@ticortitle.com

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634
Escrow Number: 12163955

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

In response to your request for payoff figures for the above reference account, the following accounting ledger is a breakdown for the payoff request.

The current balance is $1,451.75. This demand and its balance due will expire on 1/31/13. You MUST request an update as this balance will only be valid through the date above. Payment received after the expiration date will not be accepted if the balance has changed. Failure to remit the balance by the expiration date may result in the continuation of the collection process at an additional cost. Check(s) should be made payable to Red Rock Financial Services and mailed to the address below.

Sun City Anthem Community Association and/or the management company's set up fees, as well as other fees and costs that are due at closing, if any, such as future assessments, are not included. You must contact RMI Management directly at www.rmillc.com to request their demand statement for those additional amounts prior to closing.

If you have any questions, please contact our office at 702-932-6887.

Regards,

Red Rock Financial Services

Red Rock Financial Services ■ 7251 Amigo Street, Suite 100 Las Vegas, NV 89119

www.rrfs.com ■ Phone: 702-932-6887 Toll Free: 888-319-9460 Fax: 702.341.7733

By sending your check, please be aware that you are authorizing Red Rock Financial Services to use the information on your check to make a one-time electronic debit from your account at the financial institution indicated on your check. The electronic debit will be for the amount of your check; no additional amount will be added to the amount. (If we cannot collect your electronic payment, we will issue a draft against your account.) Please contact the Accounts Receivable department at (702) 932-6887 to learn about other payment options should you prefer to not have your payment processed in this manner.

Jason Cernak

From: Jason Cernak
Sent: Wednesday, January 16, 2013 4:35 PM
To: brennan.farmer@ticortitle.com
Cc: Elizabeth Cernak
Subject: 2763 white sage dr
Attachments: 808634_20130116161513.pdf

Good afternoon,
I've attached the payoff demand you requested for the above mentioned property.

Thank you,

Jason Cernak
Finance and Accounting
Red Rock Financial Services
o. 702.932.6887 | f. 702.341.7733 | www.RRFS.com

RRFS
RED ROCK FINANCIAL SERVICES
A FirstService Residential Management Company
Click to follow RRFS!

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Red Rock Financial Services
Account Detail
Sun City Anthem Community Association

Information as of: January 16, 2013

Red Rock Financial Services Account Number: R808634
Property Address: 2763 White Sage Dr, Henderson, NV 89052
The Gordon B. Hansen Trust, dated August 22, 2008,

Detailed Summary

Date	Description	Amount	Balance	Check#
01/01/2006	Quarterly Assessment	$235.00	$235.00	
02/01/2006	Association Mgmt Payment	-$235.00	$0.00	
04/01/2006	Quarterly Assessment	$235.00	$235.00	
04/18/2006	Association Mgmt Payment	-$235.00	$0.00	
07/01/2006	Quarterly Assessment	$235.00	$235.00	
07/12/2006	Association Mgmt Payment	-$235.00	$0.00	
10/01/2006	Quarterly Assessment	$235.00	$235.00	
10/26/2006	Association Mgmt Payment	-$235.00	$0.00	
01/01/2007	Quarterly Assessment	$235.00	$235.00	
01/11/2007	Association Mgmt Payment	-$235.00	$0.00	
03/08/2007	Association Mgmt Payment	-$235.00	-$235.00	
04/01/2007	Quarterly Assessment	$235.00	$0.00	
06/08/2007	Association Mgmt Payment	-$235.00	-$235.00	
07/01/2007	Quarterly Assessment	$235.00	$0.00	
10/01/2007	Sun City Anthem QT Assmt	$235.00	$235.00	
10/11/2007	Association Mgmt Payment	-$235.00	$0.00	1873
01/01/2008	Sun City Anthem QT Assmt	$275.00	$275.00	
01/11/2008	Association Mgmt Payment	-$275.00	$0.00	6761
03/01/2008	Special Assessment	-$81.32	-$81.32	
03/01/2008	Special Assessment	$81.32	$0.00	
04/01/2008	Sun City Anthem QT Assmt	$275.00	$275.00	
04/08/2008	Association Mgmt Payment	-$275.00	$0.00	3313
06/01/2008	Unit Repair	$81.32	$81.32	
06/25/2008	Association Mgmt Payment	-$81.32	$0.00	2044
07/01/2008	Sun City Anthem QT Assmt	$275.00	$275.00	

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Red Rock Financial Services
Account Detail
Sun City Anthem Community Association
Information as of: January 16, 2013

Red Rock Financial Services Account Number: R808634
Property Address: 2763 White Sage Dr, Henderson, NV 89052
The Gordon B. Hansen Trust, dated August 22, 2008,

Detailed Summary

Date	Description	Amount	Balance	Check#
07/11/2008	Association Mgmt Payment	-$275.00	$0.00	6578
09/25/2008	Association Mgmt Payment	-$175.00	-$175.00	02057
10/01/2008	Sun City Anthem QT Assmt	$175.00	$0.00	
12/31/2008	Association Mgmt Payment	-$240.00	-$240.00	02074
01/01/2009	Sun City Anthem QT Assmt	$240.00	$0.00	
04/01/2009	Sun City Anthem QT Assmt	$240.00	$240.00	
04/07/2009	Association Mgmt Payment	-$240.00	$0.00	02090
07/01/2009	Sun City Anthem QT Assmt	$240.00	$240.00	
07/13/2009	Association Mgmt Payment	-$240.00	$0.00	23791
10/09/2009	Association Mgmt Payment	-$240.00	-$240.00	97004
01/01/2010	Sun City Anthem QT Assmt	$240.00	$0.00	
01/25/2010	Association Mgmt Payment	-$240.00	-$240.00	10803
04/01/2010	Sun City Anthem QT Assmt	$240.00	$0.00	
07/01/2010	Sun City Anthem QT Assmt	$240.00	$240.00	
07/30/2010	Late Fee	$25.00	$265.00	
08/16/2010	Association Mgmt Payment	-$265.00	$0.00	63164
10/07/2010	Association Mgmt Payment	-$240.00	-$240.00	98965
01/01/2011	Sun City Anthem QT Assmt	$250.00	$10.00	
02/18/2011	Association Mgmt Payment	-$10.00	$0.00	84899
04/01/2011	Sun City Anthem QT Assmt	$250.00	$250.00	
04/30/2011	Late Fee	$25.00	$275.00	
05/20/2011	Association Mgmt Payment	-$275.00	$0.00	02215
07/01/2011	Sun City Anthem QT Assmt	$250.00	$250.00	
07/30/2011	Late Fee	$25.00	$275.00	
08/18/2011	Association Mgmt Payment	-$275.00	$0.00	02227

Red Rock Financial Services
Account Detail
Sun City Anthem Community Association

Information as of: January 16, 2013

Red Rock Financial Services Account Number: R808634
Property Address: 2763 White Sage Dr, Henderson, NV 89052
The Gordon B. Hansen Trust, dated August 22, 2008,

Detailed Summary

Date	Description	Amount	Balance	Check#
10/01/2011	Sun City Anthem QT Assmt	$250.00	$250.00	
10/11/2011	Association Mgmt Payment	-$240.00	$10.00	52791
11/22/2011	Association Mgmt Payment	-$10.00	$0.00	61105
01/01/2012	Sun City Anthem QT Assmt	$275.00	$275.00	
01/30/2012	Late Fee	$25.00	$300.00	
02/21/2012	Association Mgmt Payment	-$300.00	$0.00	00112
04/01/2012	Sun City Anthem QT Assmt	$275.00	$275.00	
04/26/2012	Association Mgmt Payment	-$275.00	$0.00	127
07/01/2012	Sun City Anthem QT Assmt	$275.00	$275.00	
07/31/2012	Late Fee	$25.00	$300.00	
08/31/2012	Late Fee	$25.00	$325.00	
09/13/2012	Management Company Collection Cost	$150.00	$475.00	
09/17/2012	Intent to Lien Letter	$125.00	$600.00	
09/17/2012	Intent Mailing Costs	$8.97	$608.97	
09/17/2012	Intent Mailing Costs	$8.97	$617.94	
09/24/2012	Vendor Adjustment	-$150.00	$467.94	
09/30/2012	Late Fee	$25.00	$492.94	
09/30/2012	Interest	$1.21	$494.15	
10/01/2012	Sun City Anthem QT Assmt	$275.00	$769.15	
10/18/2012	Red Rock Partial Payment	-$300.00	$469.15	PC 143
10/31/2012	Late Fee	$25.00	$494.15	
11/30/2012	Late Fee	$25.00	$519.15	
12/05/2012	Lien Recording Costs	$34.00	$553.15	
12/05/2012	Lien Release	$30.00	$583.15	

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Red Rock Financial Services
Account Detail
Sun City Anthem Community Association

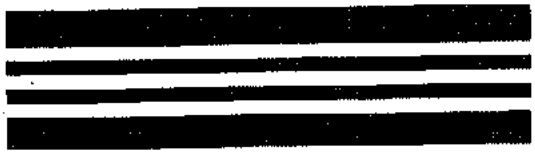
Information as of: January 16, 2013

Red Rock Financial Services Account Number: R808634
Property Address: 2763 White Sage Dr, Henderson, NV 89052
The Gordon B. Hansen Trust, dated August 22, 2008,

Detailed Summary

Date	Description	Amount	Balance	Check#
12/05/2012	Lien for Delinquent Assessment	$325.00	$908.15	
12/05/2012	Lien Mailing Costs	$8.20	$916.35	
12/05/2012	Lien Mailing Costs	$8.20	$924.55	
12/20/2012	Payoff Demand	$150.00	$1,074.55	
12/31/2012	Late Fee	$25.00	$1,099.55	
12/31/2012	Interest	$1.10	$1,100.65	
01/01/2013	Sun City Anthem QT Assmt	$275.00	$1,375.65	
01/16/2013	Payoff Demand	$50.00	$1,425.65	
1/31/2013	interest	$1.10	$1,426.75	
1/31/2013	LATE FEE	$25.00	$1,451.75	

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.



808634

Payoff Demand Received

5/16/2013

AA 000774

Jason Cernak

From: Lee Cedola <lee@proudfitrealty.com>
Sent: Thursday, May 16, 2013 11:05 AM
To: RRFS Payoff Request
Cc: Mickie.salgado@ticortitle.com
Subject: 2763 White Sage Drive, Henderson, NV - Esc #1316-3496

Importance: High

Hello:

Our office represents the interests of the Seller/Trustee with regard to the sale of the above referenced short sale property.

We are expecting a short sale approval letter to be re-issued in the name of the new buyers. Escrow is expected to close no later than June 28, 213.

Accordingly, please provide a payoff statement at your first opportunity.

Thank you

Lee Cedola
Licensed Assistant
Lee@ProudfitRealty.com
Proudfit Realty
2800 Bicentennial Parkway
Suite #130
Henderson, NV 89044
Phone: 702-453-7653

808634

Payoff Demand Sent

5/29/2013

RRFS
RED ROCK FINANCIAL SERVICES

Numbers of Pages 6

May 29, 2013

Proudfit Realty
Attn: Lee Cedola
Via Email: lee@proudfitrealty.com

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634
Escrow Number: 1316-3496

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

In response to your request for payoff figures for the above reference account, the following accounting ledger is a breakdown for the payoff request.

The current balance is $3,055.47. This demand and its balance due will expire on 6/13/13. You MUST request an update as this balance will only be valid through the date above. Payment received after the expiration date will not be accepted if the balance has changed. Failure to remit the balance by the expiration date may result in the continuation of the collection process at an additional cost. Check(s) should be made payable to Red Rock Financial Services and mailed to the address below.

Sun City Anthem Community Association and/or the management company's set up fees, as well as other fees and costs that are due at closing, if any, such as future assessments, are not included. You must contact RMI Management directly at www.rmillc.com to request their demand statement for those additional amounts prior to closing.

If you have any questions, please contact our office at 702-932-6887.

Regards,

Red Rock Financial Services

702.932.6887 | fax 702.341.7733 | 4775 W. Teco Avenue, Suite 140, Las Vegas, Nevada 89118 | www.rrfs.com

By sending your check, please be aware that you are authorizing Red Rock Financial Services to use the information on your check to make a one-time electronic debit from your account at the financial institution indicated on your check. This electronic debit will be for the amount of your check; no additional amount will be added to the amount. (If we cannot collect your electronic payment, we will issue a draft against your account.) Please contact the Accounts Receivable department at (702) 932-6887 to learn about other payment options should you prefer to not have your payment processed in this manner.

Christie Marling
Trustee Sale Officer
Red Rock Financial Services

o. 702.483.2996 | **f.** 702.940.7095 | www.RRFS.com
A FirstService Residential Management Company

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From: Craig Leidy [mailto:cleidy21@aol.com]
Sent: Tuesday, March 04, 2014 9:11 AM
To: Christie Marling
Subject: Re: 2763 White Sage Dr

Christie,

Sorry about that. In my haste to send this to you I sent the wrong letter. Here is the correct letter along with a death certificate.
Craig Leidy
Broker/Salesman CRS SFR
Prudential Americana Group REALTORS
3185 Saint Rose Pkwy. Ste.100
Henderson, NV 8952
702-595-9007 = Cell
702-940-2121 = Office
702-317-3384= Fax
www.mrsuncity.com
-----Original Message-----
From: Christie Marling <CMarling@rrfs.com>
To: Craig Leidy <cleidy21@aol.com>; Anna Romero <ARomero@rrfs.com>
Sent: Tue, Mar 4, 2014 6:48 am
Subject: RE: 2763 White Sage Dr

Good Morning Craig,

There is no signature on this?

Thanks,

Christie Marling
Trustee Sale Officer
Red Rock Financial Services

o. 702.483.2996 | **f.** 702.940.7095 | www.RRFS.com
A FirstService Residential Management Company

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reproduction or distribution of this message is prohibited. If you have received this message in error, please notify the sender immediately by return e-mail and delete/destroy the message and any copies thereof.

From: Craig Leidy [mailto:cleidy21@aol.com]
Sent: Monday, March 03, 2014 10:43 AM
To: Anna Romero
Cc: Christie Marling
Subject: RE: 2763 White Sage Dr

Christy,

Enclosed is the Letter of Authorization signed by the Trustee. If you need something else specific to the association accounts, please let me know and I will try to accommodate.

Thank you for the consideration in the postponement of the sale. I'm trying to work this out for everyone concerned.
Craig Leidy
Broker/Salesman CRS SFR
Prudential Americana Group REALTORS
3185 Saint Rose Pkwy. Ste.100
Henderson, NV 8952
702-595-9007 = Cell
702-940-2121 = Office
702-317-3384= Fax
www.mrsuncity.com

Letter of Authorization

February 1, 2014

To: Nationstar Mortgage
RE: Loan # 0618315261
Property Address:
2753 White Sage Dr.
Henderson, NV 89052

I, **Nona Tobin**, as Successor Trustee of the Estate of Gordon Hanson, hereby authorize Nationstar Mortgage and any of their affiliates to discuss any and all information regarding the above referenced property with **Mr. Craig Leidy** of Prudential Americana Group REALTORS, 3185 St Rose Parkway, Henderson, NV 89052..

For verification, the last four digits of the deceased's social security number are 6401.

I have also included with this Letter of Authorization a copy of the deceased's Death Certificate and a copy of the Certificate of Revocable Living Trust.

Nona Tobin — Date: 2/2/14
Successor Trustee of the Gordon B. Hanson Trust

Craig Leidy — Date: 2.2.14

RRFS
RED ROCK FINANCIAL SERVICES

Waiver or Reduction in Fees and Fines

March 7, 2014 RRFS # 808634

Address: 2763 White Sage Dr Owner: Gordon B. Hansen Trust / Realtor Cra

RRFS Representative: Christie Marling

Dear Board

Red Rock Financial Services has received a request from the above referenced owner for a waiver or reduction in fees or fines. Please find below the following information: an account balance with a breakdown of that balance, details regarding the reason for the waiver or reduction request, and a section where you can let us know how you would like us to proceed. The account has been placed on hold pending your decision. Should you have any questions please feel free to contact the above mentioned representative at our office.

Account Balance Information

Association Charges				Red Rock Charges	
Assessments	$1,650.00	**Interest**	**$18.81**	Collection Fees	$3,037.64
Late Fees	**$400.00**	Other	$0.00		
Fines	$0.00				
		Waiver Request (Items in Bold)	**$418.81**		
		Current Balance Owed Association	**$2,068.81**	**Total Current Balance Owed**	**$5,106.45**
		Association Balance if Waiver Granted	**$1,650.00**	**Total Balance With Waiver**	**$4,687.64**

Reason for the Request

The Homeowner of the property is deceased. The estate handler is trying to get rid of the property as there is no money in the estate to keep the property up. The realtor has asked for a postponement of the sale and waiver of late fees and interest. The realtor has at least one cash offer on the property already at this time.

Board Decision

Please choose one of the following options. If you choose "Other" please detail how you would like us to proceed. As this account is currently on hold pending your decision we request a response as quickly as possible.

- [ ] Grant the full reduction requested in the amount of $418.81
- [ ] Allow a partial reduction (please specify the amount)
- [ ] Other

Board Signature _____ Date _____

4775 W Teco Avenue, Suite 140 | Las Vegas, Nevada 89118 | 702-932-6887

808634

Printable Message

Close

Property:	2763 WHITE SAGE DR HENDERSON NV, 89052
Subject:	HOA
Body:	Hello, please be advised the max I will be able to pay the HOA is $1,100.
Attachment(s):	No Attachment
Created By/Date:	DURAN, VERONICA - 05/28/2014 09:29:38
Notification From:	VERONICA.DURAN@NATIONSTARMAIL.COM
Notification To:	CLEIDY21@AOL.COM;

As the Equator Workstation is a technology platform utilized by third parties (including Servicers, agents, vendors, buyers, sellers, brokers, et.al.) to communicate and manage the process related to Servicer properties, please be advised that Equator is not a party to any transactions that take place, is not responsible for, nor does it have any control over, the content or messages being sent through its platform and hereby disclaims all liability related to such transactions, content or messages.

Christie Marling

To: Craig Leidy
Subject: RE: 2763 White Sage Dr./ The Hansen Estate
Attachments: 2763 White Sage - Response.pdf

Craig,

Please see response regarding the settlement request for $1,000.00.

Please let me know if you have any questions.

Thanks,

Christie Marling
Trustee Sale Officer
Red Rock Financial Services

o. 702.932.6887 | f. 702.341.7733 | www.RRFS.com
A FirstService Residential Management Company

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.
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From: Craig Leidy [mailto:cleidy21@aol.com]
Sent: Thursday, June 05, 2014 3:08 PM
To: Christie Marling
Subject: RE: 2763 White Sage Dr./ The Hansen Estate

Christie,

Enclosed is the message I received from the negotiator at Equator.

Craig Leidy
Broker/Salesman CRS SFR
Berkshire Hathaway Home Services
Nevada Properties
3185 Saint Rose Pkwy. Ste.100
Henderson, NV 89052
702-595-9007 = Cell
702-410-1769 = Office
702-317-3384 = Fax
www.mrsuncity.com

RRFS
RED ROCK FINANCIAL SERVICES

Waiver or Reduction in Fees and Fines

June 9, 2014

RRFS # 808634

Address: 2763 White Sage Dr

Owner: Gordon B. Hansen Trust (Deceased)

RRFS Representative: Christie Marling

Dear Board

Red Rock Financial Services has received a request from the above referenced owner for a waiver or reduction in fees or fines. Please find below the following information: an account balance with a breakdown of that balance, details regarding the reason for the waiver or reduction request, and a section where you can let us know how you would like us to proceed. The account has been placed on hold pending your decision. Should you have any questions please feel free to contact the above mentioned representative at our office.

Account Balance Information

Association Charges				Red Rock Charges	
Assessments	$1,925.00	Interest	$34.32	Collection Fees	$3,037.64
Late Fees	**$425.00**	Other	$0.00		
Fines	$0.00				
		Waiver Request (Items in Bold)	$459.32		
		Current Balance Owed Association	**$2,384.32**	**Total Current Balance Owed**	**$5,421.96**
		Association Balance if Waiver Granted	**$1,925.00**	**Total Balance With Waiver**	**$4,962.64**

Reason for the Request

Board Decision

Please choose one of the following options. If you choose "Other" please detail how you would like us to proceed. As this account is currently on hold pending your decision we request a response as quickly as possible.

- [x] Grant the full reduction requested in the amount of $459.32 – with condition that $1925 is paid by 7/15/14
- [ ] Allow a partial reduction (please specify the amount)
- [ ] Other

Board Signature Jean Capelli Date 6/26/14

RRFS
RED ROCK FINANCIAL SERVICES

July 2, 2014

The Gordon B. Hansen Trust, dated August 22, 2008
c/o The Estate of Gordon B. Hansen
2664 Olivia Heights Ave
Henderson, NV 89052

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Dear The Gordon B. Hansen Trust, dated August 22, 2008 ,

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Red Rock Financial Services (Red Rock) is in receipt of your correspondence. Sun City Anthem Community Association (the Association) has denied your request for a settlement of $1,000.00; however, the Association has agreed to waive the late fees and interest from the account contingent upon the remaining balance being paid in full no later than **July 15, 2014.**

The current balance on the account is $5237.64. Enclosed is an accounting ledger for your review. Please pay the account in full or submit a request to make payment arrangements by **July 15, 2014**. Enclosed is a Payment Agreement Request Form for your convenience. Upon receipt of such request our office will establish the Agreement and notify you in writing of its terms. Payments must be in the form of a cashier's check or money order made payable to Red Rock Financial Services and mailed to the address below. Failure to remit payment or the Request form by **July 15, 2014** may result in the continuation of the collection process at additional costs to you.

Additional information regarding this account can be obtained at www.rrfs.com. Please contact the office of Red Rock Financial Services at 702-932-6887 with any questions.

Sincerely,

Red Rock Financial Services
Enclosure(S)

702.932.6887 | fax 702.341.7733 | 4775 W. Teco Avenue, Suite 140, Las Vegas, Nevada 89118 | www.rrfs.com

By sending your check, please be aware that you are authorizing Red Rock Financial Services to use the information on your check to make a one-time electronic debit from your account at the financial institution indicated on your check. This electronic debit will be for the amount of your check; no additional amount will be added to the amount. (If we cannot collect your electronic payment, we will issue a draft against your account.) Please contact the Accounts Receivable department at (702) 932-6887 to learn about other payment options should you prefer to not have your payment processed in this manner.

Christie Marling

To: Gary Leobold (SunCityAnthemNV) (gary.leobold@scacai.com)
Cc: Anna Romero; Jean Capillupo (scabodjean@gmail.com)
Subject: SCA - Sale Set 08/15/2014 - Update and Final Approval
Attachments: 2763 Whtie Sage - Final Approval.pdf

Good Morning,

As a reminder, this property is scheduled for sale on **08/15/2014**. Here is the update and breakdown. Also, I've attached the final approval form to have the Board President sign in order to proceed with the sale on this property. If the Board wishes to postpone or cancel the sale please let me know at your earliest convenience.

R808634 – **2763 White Sage DR – (Gordon B. Hansen Trust)** – ***Sale was previously postponed as the executor of the property is attempting to sell the property. As of today, RRFS is unaware of any buyer that is lined up due to the lender's terms of a short sale of the property. Please note there are no postponements available.***

Assessments - $2,200.00
Late Fees - $425.00
Interest – $42.68
Fines - $0.00 (fines cannot be included in the foreclosure balance)
Red Rock - $3,037.64 (Hard costs - $1,166.64; Fees - $1,871.00)
Total that can be taken to foreclosure - **$5,705.32**
As of the date of Sale balance will be $5,738.68 due to upcoming assessments, late fees.

Please let me know if the Board would like to

- *Move forward with the foreclosure (final approval form is attached, which would need to be signed by the **Board President** prior to the sale).*
- *Cancel the sale*

Christie Marling
Trustee Sale Officer
Red Rock Financial Services

o. 702.932.6887 | f. 702.341.7733 | www.RRFS.com

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Christie Marling

To: Gary Leobold (SunCityAnthemNV) (gary.leobold@scacai.com); Anneliese Gamboa (anneliese.gamboa@scacai.com)
Cc: Anna Romero
Subject: 2763 White Sage Dr - Update and Final Approval
Attachments: 2763 White Sage Final Approval.pdf

Good Morning,

As a reminder, this property is scheduled for sale on **05/15/2014.** Here is the update and breakdown. Also, I've attached the final approval form to have the Board President sign in order to proceed with the sale on this property. If the Board wishes to postpone or cancel the sale please let me know at your earliest convenience.

R808634 – 2763 White Sage Dr – (Gordon B Hansen Trust) – ***Sale was previously postponed for Short Sale to close escrow. RRFS has not received payment or additional contact from the owner or 3rd party. Please sign the attached form in order for our office to proceed with the sale on 05/15/2014.***

Assessments - $1,925.00
Late Fees - $425.00
Interest – $25.96
Fines - $0.00 (fines cannot be included in the foreclosure balance)
Red Rock - $3,037.64 (Hard costs - $1,166.64; Fees - $1,871.00)
Total that can be taken to foreclosure - **$5,513.60**
As of the date of Sale balance will be $5,413.60 due to upcoming assessments, late fees, etc.

Please let me know if the Board would like to

- *Postpone the sale, we have **1 postponement** remaining on each account (please provide a timeframe of how long they would like the sale postponed - i.e. 30 days)*
- *Move forward with the foreclosure (final approval form is attached, which would need to be signed by the **Board President** prior to the sale).*
- *Cancel the sale*

Christie Marling
Trustee Sale Officer
Red Rock Financial Services

o. 702.483.2996 | f. 702.940.7095 | www.RRFS.com

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EXHIBIT 15

AUCTION ITEM NO. HL79702B / 618315261

PURCHASE AGREEMENT WITH JOINT ESCROW INSTRUCTIONS

This Purchase Agreement with Joint Escrow Instructions (this "Agreement") is executed by and between Buyer and Seller, who agree as follows:

LIMITATION OF SELLER'S LIABILITY AND BUYER'S WAIVER OF IMPORTANT RIGHTS: BUYER AGREES THAT BUYER IS BUYING THE PROPERTY "AS IS, WHERE IS, WITH ALL FAULTS AND LIMITATIONS" (AS MORE FULLY SET FORTH IN EXHIBIT B TO THIS AGREEMENT).

1. OFFER:

A. SELLER: ESTATE OF GORDON HANSEN and NULL phone number: _____
email address: _____

B. BUYER: MZK RESIDENTIAL, LLC phone number: _____
email address: _____

C. PURCHASE PRICE: $ 367,500.00 (Winning Bid Amount ("WBA") $ 350,000.00 Buyer's premium (5% of WBA) $ 17,500.00)

D. PROPERTY:
Property Address: 2783 WHITE SAGE DR HENDERSON NV 89052
APN: _____
Legal Description of Property: See Exhibit A

E. CLOSING DATE: The earlier of 06/23/2014 or the date that is forty five (45) days after the date this Agreement is executed by Buyer.

F. ESCROW AGENT: Ashley Remington phone number: 702-366-2969
email address ashley.remington@ctt.com

G. TITLE COMPANY: NA

H. AUCTIONEER: Auction.com

2. AGENCY. The disclosures related to the relationship with a broker or brokers are set forth at the end of this Agreement (before the Exhibits).

3. FINANCE TERMS.

A. EARNEST MONEY DEPOSIT. Buyer shall be required to deposit $ 18,375.00 (the "Earnest Money Deposit") no later than the first business day following Buyer being declared the winning bidder (including for sales subject to confirmation). The Earnest Money Deposit shall be deposited with Escrow Agent (unless Buyer is executing an Auction Bid Deposit Escrow Agreement with Auctioneer's designated servicer ("Bidder's Bank Servicer") in connection with this Agreement, in which case the Earnest Money Deposit shall be deposited in accordance with such Auction Bid Deposit Escrow Agreement). Regardless of the amount financed, the Earnest Money Deposit amount required will not change. The Earnest Money Deposit will be non-refundable (except as specifically provided herein), and it will be applied only as provided in this Section or in Section 13. The term "Earnest Money Deposit" shall include interest, if any, earned on the Earnest Money Deposit.

B. ESCROW ARRANGEMENT. The Earnest Money Deposit is to be comprised of (1) the Winning Bidder's deposit made when registering to bid, if made by wire transfer ("Initial Bid Deposit"), plus (2) a wire transfer equal to the difference between the total Earnest Money Deposit and the value of the Initial Bid Deposit.

C. TRANSFER OF BIDDER'S BANK (IF ANY). If applicable, Buyer, by execution of this Agreement, hereby authorizes the transfer of the Earnest Money Deposit held by Bidder's Bank Servicer pursuant to the Auction Bid Deposit Escrow Agreement to Escrow Agent. No further action, consent, instruction or document from Buyer shall be required for such transfer.

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SELLER'S INITIALS _____ / _____
BUYER'S INITIALS AKS / _____

AUCTION ITEM NO. HL797028 / 618315261

Property Address: 2783 WHITE SAGE DR HENDERSON NV 89052

AUCTION ADDENDUM – SHORT SALE

SELLER: ESTATE OF GORDON HANSEN and NULL

BUYER: MZK RESIDENTIAL, LLC

This Auction Addendum–Short Sale ("SS Addendum") amends and supplements that certain Purchase and/or Sales Agreement ("Agreement") for the purchase of the real property identified above. Seller agrees to sell to Buyer and Buyer agrees to purchase from Seller, the "Property" (as described in the Agreement) for the Total Purchase Price on the terms and conditions as set forth in the Agreement and on such terms as set forth herein. Any capitalized terms not otherwise defined herein shall have the meanings as set forth in the Agreement. If there is a conflict between the Agreement and the terms and provisions of this SS Addendum, the terms of this SS Addendum shall control.

1. TOTAL PURCHASE PRICE CALCULATION:

Winning Bid Amount:	$ 350,000.00
plus Buyer's Premium payable to auctioneer:	$ 17,500.00
equals TOTAL PURCHASE PRICE:	$ 367,500.00
Earnest Money Deposit* from Buyer:	$ 18,375.00

☑ CHECK BOX if first property acquired at auction ("Earnest Money Deposit to be 5% of Total Purchase Price or $2,500, whichever is greater. First $2,500 of Earnest Money Deposit shall be in the form of a cashier's check or cash.)

☐ CHECK BOX if NOT first property acquired at auction ("Earnest Money Deposit to be 15% of Total Purchase Price or $5,000, whichever is greater. First $5,000 of Earnest Money Deposit shall be in the form of a cashier's check or cash.)

A. **Bidder's Bank.** Upon being declared the Winning Bidder, information regarding a bidder's bank ("Bidder's Bank") will be provided to the Buyer for delivery of the Earnest Money Deposit. The Buyer, by execution of this Agreement, hereby agrees to deliver the Earnest Money Deposit to the Bidder's Bank, as directed by auctioneer and further, Buyer, by execution of this Agreement, hereby authorizes the transfer of the monies held on account of Buyer in the Bidder's Bank, if any, to be transferred to the Escrow/Closing Agent set forth herein upon the approval by the Short Sale Lender as set forth in Section 6 below, and cancellation of any previous escrow, if applicable, regarding the Property. No further action, consent, instruction or document from Buyer shall be required.

BUYER INITIALS MKS / _____

2. CLOSING DATE: 06/23/2014 Escrow/Closing Agent shall close the transaction contemplated by the Agreement and this SS Addendum (the "Close of Escrow" or "Closing") on the earlier of the date set forth herein or the date that is forty-five (45) days after the date this SS Addendum is executed by Buyer. If such date falls on a weekend or a state or federally recognized holiday, such Closing Date shall be the next business day. Any extension must be mutually agreed to in writing by the parties hereto.

SELLER INITIALS _____ BUYER INITIALS MKS

AUCTION ITEM NO. HL797D2B / 618315261

Property Address: 2763 WHITE SAGE DR HENDERSON NV 89052

3. **FINANCING.** Buyer represents and warrants as follows (CHECK ONE BOX ONLY):

☑ A. **No Financing Contingency.** Buyer understands and agrees that the purchase of the Property and the transaction contemplated by the Agreement and this SS Addendum IS NOT contingent on the Buyer obtaining financing for the purchase of the Property. Notwithstanding that there is no financing contingency, the Seller may require Buyer to obtain pre-qualification at or prior to entering into this Agreement. If required, Buyer agrees to pre-qualify with Seller's auction designated lender and cooperate with such lender in the processing of this transaction (Buyer may obtain financing, if desired, through any lender of his or her choice). The failure of Buyer to consummate and close the transaction contemplated by the Agreement and this SS Addendum may entitle Seller to liquidated damages or other legal remedies.

BUYER INITIALS MKS

☐ B. **Financing Contingency.** Buyer has provided Seller with verifiable evidence that Buyer has pre-qualified for a loan to be secured by a first priority mortgage or deed of trust encumbering the Property (the "**New First Mortgage Loan/Trust Deed Loan**") which, when combined with the Earnest Money Deposit and additional funds of Buyer, immediately verifiable and available, will be sufficient to pay all amounts Buyer is required to pay under this Agreement to complete the purchase of the Property on or before the Close of Escrow. Buyer shall act diligently and in good faith to cooperate with the lender and provide information reasonably requested in a timely manner to comply with the lender's requirements to qualify for financing. Buyer shall notify Seller or Seller's agent, in writing, within fifteen (15) calendar days of execution of this Agreement by Buyer of Buyer's final financing approval, including providing the name and contact information for Buyer's lender. If, through no fault of Buyer, Buyer is unable to obtain New First Mortgage Loan/Trust Deed Loan in the amount that Buyer pre-qualified for within fifteen (15) calendar days after executing the Agreement and this SS Addendum, Buyer or Seller may terminate the transaction contemplated by the Agreement and this SS Addendum and this transaction shall be cancelled. Upon cancellation under this section, the Escrow/Closing Agent shall return to Buyer any Earnest Money Deposit given by Buyer to Escrow/Closing Agent, less document, administrative and processing fees, if any, incurred by Escrow/Closing Agent in relation to the transaction contemplated by the Agreement and this SS Addendum. Upon Escrow/Closing Agent's receipt of signed cancellation instructions from Buyer or Seller pursuant to this section, Buyer and Seller shall be relieved of any further liability and/or obligation each to the other under this Agreement other than those terms that expressly survive such termination of the Agreement and this SS Addendum.

BUYER INITIALS _____/_____

4. **INSPECTION AND APPRAISAL CONTINGENCY.** Buyer understands and agrees that the purchase of the Property and the transaction contemplated by the Agreement and this SS Addendum IS NOT contingent on the results of any inspection regarding the Property and Buyer waives the right to cancel the transaction based on the results of any inspection. Buyer further understands and agrees that the purchase of the Property IS NOT contingent upon a written appraisal of the Property at no less than the Total Purchase Price.

5. **TIME PERIODS.** All time periods set forth in the Agreement for inspections, contingencies, covenants, and other obligations shall begin the date this SS Addendum is executed by Buyer.

6. **SHORT SALE APPROVAL.** THE AGREEMENT IS CONTINGENT UPON SELLER'S RECEIPT OF AND DELIVERY TO BUYER OF WRITTEN CONSENT ("SHORT SALE LENDERS' CONSENT") TO THE AGREEMENT AND THIS SS ADDENDUM AND THEIR TERMS FROM ALL EXISTING SECURED LENDERS AND LIEN HOLDERS ("SHORT SALE LENDERS") ON OR BEFORE THE DATE SET FOR CLOSING. SHORT SALE LENDERS' CONSENT MEANS THAT ALL SHORT SALE LENDERS SHALL COLLECTIVELY AGREE TO REDUCE THEIR RESPECTIVE LOAN BALANCES BY AN AMOUNT SUFFICIENT TO PERMIT THE PROCEEDS FROM THE SALE OF THE PROPERTY TO PAY THE EXISTING BALANCES ON LOANS SECURED BY THE PROPERTY, REAL PROPERTY TAXES, BROKERAGE COMMISSIONS, CLOSING COSTS, AND OTHER MONETARY OBLIGATIONS THE AGREEMENT AND THIS SS ADDENDUM REQUIRE SELLER TO PAY AT THE CLOSE OF ESCROW

SELLER INITIALS _____ BUYER INITIALS MKS

AUCTION ITEM NO. HL79702B / 618315261

Property Address: 2763 WHITE SAGE DR HENDERSON NV 89052

(INCLUDING, BUT NOT LIMITED TO, ESCROW CHARGES, TITLE CHARGES, DOCUMENTARY TRANSFER TAXES, PRORATIONS, RETROFIT COSTS, HOMEOWNERS ASSOCIATION FEES AND REPAIRS) WITHOUT REQUIRING SELLER TO PLACE ANY FUNDS INTO ESCROW OR HAVE ANY CONTINUING OBLIGATION TO SHORT SALE LENDERS.

IF, NO LATER THAN FIVE (5) BUSINESS DAYS PRIOR TO THE CLOSING DATE, (I) SELLER HAS NOT RECEIVED SHORT SALE LENDERS' CONSENT TO THE TERMS OF THE AGREEMENT AND THIS SS ADDENDUM, SELLER MAY, IN WRITING, CANCEL THE AGREEMENT AND THIS SS ADDENDUM, OR (II) BUYER HAS NOT RECEIVED A COPY OF SHORT SALE LENDERS' CONSENT TO THE TERMS OF THE AGREEMENT AND THIS SS ADDENDUM, BUYER MAY, IN WRITING, CANCEL THE AGREEMENT AND THIS SS ADDENDUM. IN EITHER CASE, BUYER SHALL BE ENTITLED TO THE RETURN OF ANY EARNEST MONEY DEPOSIT DELIVERED TO THE ESCROW/CLOSING AGENT.

SELLER AND BUYER SHALL REASONABLY COOPERATE WITH EXISTING SHORT SALE LENDERS IN THE SHORT SALE PROCESS. SELLER IS INFORMED THAT A SHORT SALE MAY HAVE CREDIT OR LEGAL CONSEQUENCES AND MAY RESULT IN TAXABLE INCOME TO SELLER. SELLER IS ADVISED TO SEEK ADVICE FROM AN ATTORNEY, CERTIFIED PUBLIC ACCOUNTANT OR OTHER EXPERT REGARDING THE POTENTIAL CONSEQUENCES OF A SHORT SALE.

BUYER AGREES THAT BUYER IS BUYING THE PROPERTY "AS IS, WHERE IS, WITH ALL FAULTS AND LIMITATIONS." IF SELLER SUCCESSFULLY COMPLETES A COOPERATIVE SHORT SALE, SELLER WILL BE REQUIRED TO VACATE THE PROPERTY. BUYER AND SELLER REPRESENT AND WARRANT THAT THIS TRANSACTION IS AN ARM'S LENGTH TRANSACTION AND THAT NEITHER BUYER NOR SELLER ARE RELATED TO EACH OTHER NOR DO THEY HAVE A CLOSE PERSONAL OR BUSINESS RELATIONSHIP WITH THE OTHER.

7. **BUYER AND SELLER COSTS**. Buyer and Seller acknowledge that each of them may incur costs in connection with rights or obligations under the Agreement and this SS Addendum. These costs may include, but are not limited to, payments for loan applications, inspections, appraisals, and other reports. Such costs will be the sole responsibility of the party incurring them if the Short Sale Lenders do not consent to the transaction or either party cancels the transaction pursuant to the Agreement and this SS Addendum.

8. **COMMISSIONS DUE REAL ESTATE LICENSEES.** Buyer and Seller as well as their respective agents/brokers understand and acknowledge that all commissions to be paid at the closing of the transaction contemplated by the Agreement and this SS Addendum shall be calculated and paid based on the Winning Bid Amount (and not the Total Purchase Price) as set forth in Section 1.

9. **REQUIREMENT OF COMMUNICATION**. Buyer and Seller hereby authorize Escrow/Closing Agent to report to auctioneer the status of the Closing and respond to all inquiries of the auctioneer including, but not limited to, current loan status of the Buyer, status of contingencies, inspection completion, and closing status upon request of auctioneer. Buyer and Seller shall further ensure that the Escrow/Closing Agent communicate with auctioneer as set forth herein.

10. **CONFLICT**. To the extent that the terms of this SS Addendum conflict with any other terms of the Agreement, the terms of this SS Addendum shall control. All Agreement terms not specifically modified herein shall remain in full force and effect. No addition or modification of this SS Addendum shall be effective unless set forth in writing and signed by Buyer and Seller.

11. **COUNTERPARTS AND ELECTRONIC SIGNATURES**. The Agreement and this SS Addendum may be executed in multiple counterparts by the parties hereto. All counterparts so executed shall constitute one agreement binding upon all parties, notwithstanding that all parties are not signatories to the original or the same counterpart. Each counterpart shall be deemed an original Agreement all of which shall constitute one agreement to be valid as of the date of this SS Addendum. Facsimile documents executed, scanned and transmitted electronically and electronic signatures shall be deemed original signatures for purposes of this SS Addendum and all matters related thereto, with such facsimile, scanned and electronic signatures having the same legal effect as original signatures. Seller and Buyer agree that this SS Addendum, any addendum thereto or any other document necessary for the consummation of the transaction contemplated by this SS Addendum may be accepted, executed or agreed to through the use of an electronic signature in accordance with the Electronic Signatures in Global and National Commerce Act ("E-Sign Act"), Title 15, United States Code, Sections 7001 et seq., as amended, the Uniform Electronic Transaction Act ("UETA"), as amended, and any applicable state law. Any document accepted, executed or agreed to in conformity with such laws

SELLER INITIALS

MKS

BUYER INITIALS

AUCTION ITEM NO. HL79702B / 618315261

Property Address: 2763 WHITE SAGE DR HENDERSON NV 89052

will be binding on both Seller and Buyer the same as if it were physically executed and Buyer hereby consents to the use of any third party electronic signature capture service providers as may be chosen by Seller or auctioneer.

12. LEGALLY BINDING CONTRACT. THIS IS A LEGALLY BINDING ADDENDUM TO THE AGREEMENT. IF EITHER PARTY DOES NOT UNDERSTAND THE TERMS AND CONDITIONS OF THE AGREEMENT OR THIS SS ADDENDUM, CONSULT LEGAL OR OTHER COUNSEL BEFORE SIGNING. BUYER HAS BEEN ADVISED BY SELLER, SELLER'S BROKER AND AUCTIONEER TO SEEK LEGAL, FINANCIAL, CONSTRUCTION, AIR QUALITY, ENVIRONMENTAL AND/OR PROFESSIONAL INSPECTIONS AND ADVICE BY QUALIFIED PROFESSIONALS REGARDING BUYER'S PURCHASE OF THE PROPERTY AND THE TERMS OF THE AGREEMENT AND THIS SS ADDENDUM. BY SIGNING THE AGREEMENT AND THIS SS ADDENDUM, BUYER REPRESENTS AND WARRANTS THAT HE/SHE/IT HAS CONSULTED WITH, HAD THE OPPORTUNITY TO CONSULT WITH OR WAIVED THE RIGHT TO CONSULT WITH LEGAL OR OTHER PROFESSIONALS BUYER DEEMS PRUDENT OR NECESSARY.

13. SEVERABILITY. If any portion of this SS Addendum shall be declared by any court of competent jurisdiction to be invalid, illegal or unenforceable, such portion shall be deemed severed from this SS Addendum, and the remaining part of this SS Addendum shall remain in full force and effect, as fully as though such portion had never been part of this SS Addendum.

14. LANGUAGE IN BOLD OR CAPITALIZED. FOR EMPHASIS AND BUYER'S BENEFIT, SOME PROVISIONS HAVE BEEN BOLDED AND/OR CAPITALIZED (LIKE THIS SECTION), BUT EACH AND EVERY PROVISION IN THIS SS ADDENDUM IS SIGNIFICANT AND SHOULD BE REVIEWED AND UNDERSTOOD. NO PROVISION SHOULD BE IGNORED OR DISREGARDED BECAUSE IT IS NOT IN BOLD OR EMPHASIZED IN SOME MANNER, AND THE FAILURE TO BOLD, CAPITALIZE, OR EMPHASIZE IN SOME MANNER ANY TERMS OR PROVISIONS IN THIS SS ADDENDUM SHALL NOT AFFECT THE ENFORCEABILITY OF ANY TERMS OR PROVISIONS.

15. DISCLOSURE. Buyer and Seller acknowledge and agree that auctioneer has no real estate brokerage agency relationship with either party and is acting solely in the capacity of auctioneer in the transaction contemplated by the Agreement and this SS Addendum.

16. PROPERTY SOLD SUBJECT TO CONFIRMATION. Buyer(s) and Seller(s) acknowledge and agree that the transaction contemplated by the Agreement and this SS Addendum is subject to the Short Sale Lenders' Consent as set forth in Section 6.

SELLER INITIALS

MKS

BUYER INITIALS

AUCTION ITEM NO. HL79702B / 618315261

Property Address: 2763 WHITE SAGE DR HENDERSON NV 89052

Dated: 5-31-14

SELLER:

SIGNATURE

ESTATE OF GORDON HANSEN and NULL

PRINTED NAME

SIGNATURE

PRINTED NAME

Dated: 5/8/2014

BUYER(S):

DocuSigned by:
Matthew R. Sherman

SIGNATURE President
MZK RESIDENTIAL, LLC

By: Matthew R. Sherman, Operating Manager

PRINTED NAME

SIGNATURE

PRINTED NAME

SELLER'S AGENT/BROKER:

Seller's Agent/Broker hereby represents that he/she accepts the Auction Terms and Conditions in their entirety and specifically as to the compensation calculation based on the Winning Bid Amount and that this is the only compensation Agent/Broker shall receive or is entitled to for this transaction from Seller, Seller's broker or auctioneer. Agent/Broker further represents that he/she is not a principal in the transaction (as such terms are defined in the Auction Terms and Conditions).

CRAIG LEIDY

BROKER/AGENT PRINTED NAME

Prudential Americana Group REALTORS

BROKERAGE PRINTED NAME

By: Craig Leidy

BROKER/AGENT SIGNATURE

License Number: BS.00/6293 State: NV

BUYER'S AGENT/BROKER:

Buyer's Agent/Broker hereby represents that he/she has registered prior to the Auction pursuant to the Auction Terms and Conditions as a Registered Agent/Broker, that he/she accepts the Auction Terms and Conditions in their entirety and specifically as to the compensation due as the cooperating Agent/Broker set forth below, if any, and that this is the only compensation Agent/Broker shall receive or is entitled to for this transaction from Seller, Seller's broker or auctioneer. Agent/Broker further represents that he/she is not a principal in the transaction (as such terms are defined in the Auction Terms and Conditions).

Roger W. Ayala

BROKER/AGENT PRINTED NAME

BROKERAGE PRINTED NAME

DocuSigned by:
Roger W. Ayala

BROKER/AGENT SIGNATURE

License Number: BS.0143368 (BK) State: NV

SELLER INITIALS

DS
MRS

BUYER INITIALS

EXHIBIT 16

808634

Sale Occurred

8/15/2014

PRIORITY™
POSTING AND PUBLISHING

TRUSTEE SALE ☒
TRUSTOR PAYMENT ( )

RECEIPT OF FUNDS AND INSTRUCTIONS

T.S. NO. R8086634 PRIORITY NO. 1082789 DATE 8/15/14

TRUSTEE Red Rock Financial Services

ADDRESS 4775 W Teco Ave Suite 140

CITY Las Vegas STATE NV ZIP 89118

PHONE NO. 702-215-8130 CONTACT Kimberlee Sibley

CHECK NO.	NAME OF BANK	AMOUNT
1001004310	Bank of America	$ 50,000.00
1001004311	" "	$ 20,000.00
		$
		$
		$
		$

TOTAL OF ANY CASH RECEIVED $ Ø

SUCCESSFUL BID $ 63,100.00 TOTAL RECEIVED $ 70,000.00

TRANSFER TAX $ Ø AMOUNT REQUIRED $ 63,100.00

RECORDING FEES $ Ø REFUND AMOUNT $ 6,900.00

REFUND PAYABLE TO Opportunity Homes LLC

RECEIVED BY Nicole Gaudin BUYERS SIGNATURE Thomas Lucas

BUYERS NAME Thomas Lucas DRIVERS LICENSE NO. NVDL# 1702056430

TITLE TO PROPERTY TO BE VESTED AS FOLLOWS Opportunity Homes LLC

ADDRESS 2657 Windmill Pkwy #145

CITY Henderson STATE NV ZIP 89074

PHONE NO. 702-374-4234

Christie Marling

From: no-return@prioritypposting.com
Sent: Friday, August 15, 2014 10:12 AM
To: Christie Marling
Subject: Interim Sale Results for TS# R808634/HANSEN

THIS IS A SALE RESULT INTERIM UPDATE - FINAL RESULTS WITH VESTING INFORMATION TO FOLLOW

Red Rock Financial Services
Re: Interim Sale Results
Priority No.: 1082780

Attn: Foreclosure Department
Your T.S. Number R808634 sold to a 3rd party on 08/15/2014 in the county of Clark, NV at 10:00AM

Sale Conducted at: 10:11 AM

Said property sold for: $63,100.00

Said property sold to: THOMAS LUCAS

Address: ,

Comments:

No. of Witnesses Present: 45

Should you have any questions, please feel free to contact our Sales Department at (800)570-3500

The information contained in this e-mail message is intended for the confidential use of the designated recipients. If the reader of this message is not an intended recipient, you are hereby notified that any review, use, dissemination, forwarding or copying of this message is strictly prohibited. Please notify Priority Posting & Publishing ("Company") immediately by reply e-mail or telephone, and delete the original message and all attachments from your system. You are further advised that this e-mail and any response thereto is the property of the Company and can be accessed and reviewed by the company at any time. Thank You.

Christie Marling

From: Diana Carlson <dian@priorityposting.com>
Sent: Friday, August 15, 2014 10:41 AM
To: Anna Romero; Christie Marling
Subject: Final Sale Results for TS# R808634/HANSEN

Red Rock Financial Services
Re: Final Sale Results
Priority No.: 1082780

Attn: Foreclosure Department
Your T.S. number R808634 sold to a 3rd party on 08/15/2014 in the county of Clark at 10:00AM.

Sale Conducted at: 10:11AM

Said property sold for: $ 63100.00

Total required: $ 63100.00

Amount received: $ 70000.00

Refund Amount: $ 6900.00

Said property sold to: THOMAS LUCAS

Vested as: OPPORTUNITY HOMES LLC

Address: 2657 WINDMILL PKWY #145, HENDERSON, NV 89074

Telephone No.: 702-374-4234

Driver's license No.: NVDL# 1702056430

Comments:

No. of Bidders: 3

No. of Witnesses Present: 45

Refund owed to: OPPORTUNITY HOMES LLC

Address: 2652 WINDMILL PKWY #195, HENDERSON, NV 89074

Telephone No.: 702-374-4234

Should you have any questions, please feel free to contact our Sales Department at (800)570-3500 .

The information contained in this e-mail message is intended for the confidential use of the designated recipients. If the reader of this message is not an intended recipient, you are hereby notified that any review, use, dissemination, forwarding or copying of this message is strictly prohibited. Please notify Priority Posting & Publishing ("Company") immediately by reply e-mail or telephone, and delete the original message and all attachments from your system. You are further advised that this e-mail and any response thereto is the property of the Company and can be accessed and reviewed by the company at any time. Thank You.

RRFS
RED ROCK FINANCIAL SERVICES

Memorandum

To: Opportunity Homes, LLC

From: Christie Marling

Date: August 18, 2014

Subject: Foreclosure Deed

Enclosed you will find the unrecorded deed for the following property:::

2763 White Sage Drive, Henderson, NV 89052
Foreclosure Date – August 15, 2014

Should you have any questions, please contact our office at 702.932.6887.

Thank you,

Christie Marling
Red Rock Financial Services

4775 West Teco Avenue, Suite 140, Las Vegas, Nevada 89118 ◆ 702-932-6887 ◆ 702-341-7733 Fax

Mail and Return Tax statement to:
Opportunity Homes, LLC
2657 Windmill Parkway, #145
Henderson, NV 89074

APN # 191-13-811-052

FORECLOSURE DEED

The undersigned declares:

Red Rock Financial Services, herein called agent for (Sun City Anthem Community Association), was the duly appointed agent under that certain Lien for Delinquent Assessments, recorded 12/14/2012 as instrument number 0001338 Book 20121214, in Clark County. The previous owner as reflected on said lien is GORDON B. HANSEN, TRUSTEE OF THE GORDON B. HANSEN TRUST, DATED AUGUST 22, 2008. Red Rock Financial Services as agent for Sun City Anthem Community Association does hereby grant and convey, but without warranty expressed or implied to: **Opportunity Homes, LLC** (herein called grantee), pursuant to NRS 116.3116 through NRS 116.31168, all its right, title and interest in and to that certain property legally described as: SUN CITY ANTHEM UNIT #19 PHASE 2 PLAT BOOK 102 PAGE 80 LOT 85 BLOCK 4 which is commonly known as **2763 White Sage Dr Henderson, NV 89052.**

AGENT STATES THAT:
This conveyance is made pursuant to the powers conferred upon agent by Nevada Revised Statutes, the Sun City Anthem Community Association governing documents (CC&R's) and that certain Lien for Delinquent Assessments, described herein. Default occurred as set forth in a Notice of Default and Election to Sell, recorded on 03/12/2013 as instrument number 0000847 Book 20130312 which was recorded in the office of the recorder of said county. Red Rock Financial Services has complied with all requirements of law including, but not limited to, the elapsing of 90 days, mailing of copies of Lien for Delinquent Assessments and Notice of Default and the posting and publication of the Notice of Sale. Said property was sold by said agent, on behalf of Sun City Anthem Community Association at public auction on **08/15/2014**, at the place indicated on the Notice of Sale. Grantee being the highest bidder at such sale became the purchaser of said property and paid therefore to said agent the amount bid **$63,100.00** in lawful money of the United States, or by satisfaction, pro tanto, of the obligations then secured by the Lien for Delinquent Assessment.

Dated: August 18, 2014

By: Christie Marling, employee of Red Rock Financial Services, agent for Sun City Anthem Community Association

STATE OF NEVADA)
COUNTY OF CLARK)

On August 18, 2014, before me, personally appeared Christie Marling, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

ANNA ROMERO
Notary Public State of Nevada
No. 12-7487-1
My appt. exp. Apr. 20 2016

When Recorded Mail To: Opportunity Homes, LLC
2657 Windmill Parkway, #145
Henderson, NV 89074

STATE OF NEVADA
DECLARATION OF VALUE

1. Assessor Parcel Number (s)

a) 191-13-811-052
b)
c)
d)

2. Type of Property:

a) ☐ Vacant Land b) ☑ Single Fam Res.
c) ☐ Condo/Twnhse d) ☐ 2-4 Plex
e) ☐ Apt. Bldg. f) ☐ Comm'l/Ind'l
g) ☐ Agricultural h) ☐ Mobile Home
i) ☐ Other /

FOR RECORDERS OPTIONAL USE ONLY
Notes:

3. Total Value/Sales Price of Property: $
Deed in Lieu of Foreclosure Only (value of property) $
Transfer Tax Value: $
Real Property Transfer Tax Due: $

4. If Exemption Claimed:
a. Transfer Tax Exemption, per NRS 375.090, Section:
b. Explain Reason for Exemption:

5. Partial Interest: Percentage being transferred: %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month.

Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature **Capacity** AGENT
Signature **Capacity**

SELLER (GRANTOR) INFORMATION (REQUIRED)		BUYER (GRANTEE) INFORMATION (REQUIRED)	
Print Name:	Red Rock Financial Services	**Print Name:**	Opportunity Homes, LLC
Address:	4775 West Teco Ave #140	**Address:**	2557 Windmill Parkway, #145
City:	Las Vegas	**City:**	Henderson
State:	NV **Zip:** 89118	**State:**	NV **Zip:** 89074

COMPANY/PERSON REQUESTING RECORDING
(REQUIRED IF NOT THE SELLER OR BUYER)

Print Name: **Escrow #**
Address:
City: **State:** **Zip:**

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED)

(3)-1

Inst #: 20140822-0002548
Fees: $18.00 N/C Fee: $0.00
RPTT: $1805.40 Ex: #
08/22/2014 09:53:30 AM
Receipt #: 2130155
Requestor:
OPPORTUNITY HOMES LLC
Recorded By: SOL Pgs: 3
DEBBIE CONWAY
CLARK COUNTY RECORDER

Mail and Return Tax statement to:
Opportunity Homes, LLC
2657 Windmill Parkway, #145
Henderson, NV 89074

APN # 191-13-811-052

FORECLOSURE DEED

The undersigned declares:

Red Rock Financial Services, herein called agent for (Sun City Anthem Community Association), was the duly appointed agent under that certain Lien for Delinquent Assessments, recorded 12/14/2012 as instrument number 0001338 Book 20121214, in Clark County. The previous owner as reflected on said lien is GORDON B. HANSEN, TRUSTEE OF THE GORDON B. HANSEN TRUST, DATED AUGUST 22, 2008. Red Rock Financial Services as agent for Sun City Anthem Community Association does hereby grant and convey, but without warranty expressed or implied to: **Opportunity Homes, LLC** (herein called grantee), pursuant to NRS 116.3116 through NRS 116.31168, all its right, title and interest in and to that certain property legally described as: SUN CITY ANTHEM UNIT #19 PHASE 2 PLAT BOOK 102 PAGE 80 LOT 85 BLOCK 4 which is commonly known as **2763 White Sage Dr Henderson, NV 89052.**

AGENT STATES THAT:
This conveyance is made pursuant to the powers conferred upon agent by Nevada Revised Statutes, the Sun City Anthem Community Association governing documents (CC&R's) and that certain Lien for Delinquent Assessments, described herein. Default occurred as set forth in a Notice of Default and Election to Sell, recorded on 03/12/2013 as instrument number 0000847 Book 20130312 which was recorded in the office of the recorder of said county. Red Rock Financial Services has complied with all requirements of law including, but not limited to, the elapsing of 90 days, mailing of copies of Lien for Delinquent Assessments and Notice of Default and the posting and publication of the Notice of Sale. Said property was sold by said agent, on behalf of Sun City Anthem Community Association at public auction on **08/15/2014**, at the place indicated on the Notice of Sale. Grantee being the highest bidder at such sale became the purchaser of said property and paid therefore to said agent the amount bid **$63,100.00** in lawful money of the United States, or by satisfaction, pro tanto, of the obligations then secured by the Lien for Delinquent Assessment.

Description: Clark,NV Document-Year.Date.DocID 2014.822.2548 Page: 1 of 3
Order: 2763 White Saga Comment:

Dated: August 18, 2014

By: Christie Marling, employee of Red Rock Financial Services, agent for Sun City Anthem Community Association

STATE OF NEVADA)
COUNTY OF CLARK)

On August 18, 2014, before me, personally appeared Christie Marling, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

ANNA ROMERO
Notary Public State of Nevada
No. 12-7487-1
My appt. exp. Apr. 20 2016

When Recorded Mail To: Opportunity Homes, LLC
2657 Windmill Parkway, #145
Henderson, NV 89074

Description: Clark,NV Document-Year.Date.DocID 2014.822.2548 Page: 2 of 3
Order: 2763 White Sage Comment:

STATE OF NEVADA
DECLARATION OF VALUE

1. Assessor Parcel Number (s)

a) 191-13-611-052
b)
c)
d)

2. Type of Property:

a) ☐ Vacant Land b) ☑ Single Fam Res.
c) ☐ Condo/Twnhse d) ☐ 2-4 Plex
e) ☐ Apt. Bldg. f) ☐ Comm'l/Ind'l
g) ☐ Agricultural h) ☐ Mobile Home
i) ☐ Other

FOR RECORDERS OPTIONAL USE ONLY
Notes: H

3. Total Value/Sales Price of Property: $ 63,100.00
Deed in Lieu of Foreclosure Only (value of property) $
Transfer Tax Value: $ 353,529.00
Real Property Transfer Tax Due: $ ~~323.85~~ 1,805.40

4. If Exemption Claimed:
a. Transfer Tax Exemption, per NRS 375.090, Section:
b. Explain Reason for Exemption:

5. Partial Interest: Percentage being transferred: %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month.

Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature _____ **Capacity** AGENT
Signature _____ **Capacity** _____

SELLER (GRANTOR) INFORMATION (REQUIRED)		**BUYER (GRANTEE) INFORMATION** (REQUIRED)	
Print Name:	Red Rock Financial Services	**Print Name:**	Opportunity Homes, LLC
Address:	4775 West Teco Ave #140	**Address:**	2857 Windmill Parkway, #145
City:	Las Vegas	**City:**	Henderson
State:	NV **Zip:** 89118	**State:**	NV **Zip:** 89074

COMPANY/PERSON REQUESTING RECORDING
(REQUIRED IF NOT THE SELLER OR BUYER)
Print Name: _____ **Escrow #** _____
Address: _____
City: _____ **State:** _____ **Zip:** _____

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED)

Description: Clark,NV Document-Year.Date.DocID 2014.822.2548 Page: 3 of 3
Order: 2763 White Sage Comment:

EXHIBIT 17

Gmail

Nona Tobin <nonatobin@gmail.com>

Questions about HOA Foreclosure sale
1 message

Nona Tobin <nonatobin@gmail.com>
To: Craig Leidy <cleidy21@aol.com>

Mon, Oct 13, 2014 at 12:08 PM

Craig, after considering the HOA dues delinquency foreclosure sale of 2763 White Sage, I have some questions:

1. What documents has Red Rock Financial sent to you as my agent? I would like to get a copy of those documents.

2. If Berkshire Hathaway received documents from Red Rock Financial why did you not inform me of them in a timely manner?

3. When did you start working with Tom Lucas to purchase this property and did you get paid for your services?

4. What is the status of Nationstar and what do you know of their expectations to make any claims on the money that has been interpleaded with District Court?

I'm enumerating these questions so you will answer each of them specifically. I'm feeling like you dropped me like a hot potato after helping Tom Lucas, a Berkshire Hathaway agent, to become the beneficiary of a giant windfall. When I didn't hear from you, I spoke with Red Rock Financial and to a couple of real estate attorneys, and I am pretty dissatisfied with the manner in which the interests of the Trust were handled by Berkshire Hathaway.

Starting with Red Rock: the first person I spoke to told me that once Red Rock takes the amount that is due to them, they interplead the balance with district court and notify all the potential parties so they can make a claim and the court can decide on distribution. When I

didn't hear from you about what the specific amount was, I called Red Rock back to get it, and I was told that they couldn't talk to me because I wasn't listed as the designated person. I can only assume that because I signed an authorization for Berkshire Hathaway to receive all the notices from them when we first set up the listing last February that Berkshire Hathaway was the authorized agent and you are the specific person that they would have considered the recipient for notices that previously had gone to me as the Successor Trustee.

I am very concerned about this point now. I never received any notice regarding the interpleading. Obviously, I need to get whatever Berkshire Hathaway received from Red Rock as my agent so I can proceed on behalf of the Trust. Since I am unfamiliar with these matters, I do not know if time is of the essence or not in terms of filing a claim in District Court.

I am also concerned about the notices that Red Rock sent Berkshire Hathaway regarding the sale that was actually held. You always told me that foreclosure was no problem, that they always delayed these type of HOA delinquency sales when a short sale was pending. I never knew anything about a sale actually happening until it was done and you were working with the guy that bought it.

I raised my concerns about the manner in which the foreclosure sale was handled as well as what I thought was appropriate to address the interests of the Trust previously with you, but the whole matter seems to have been ignored by Berkshire Hathaway, you, Tom Lucas and your broker.

Doesn't the listing agreement contractually require that you and Berkshire Hathaway act on my behalf as the Successor Trustee and

protect the interests of the Trust?

It seems that you unilaterally quit representing my interests as the Successor Trustee without notice. Neither you nor your Broker responded to my many attempts to determine if in fact the bank really couldn't prove it was the owner of the note, then suddenly another Berkshire Hathaway agent in your branch buys it on a surprise sale, possibly betting on information I provided you and the Broker and getting you to help him gain a huge windfall.

Then, inexplicably you wanted me to sign a backdated paper to cancel the listing after the sale had already taken place since you could not take it off MLS without my signature. This didn't make sense. It looked to me like you wanted me to "fire" you or release your agency from the apparent conflict. I'm very confused by this, and one of the attorneys I consulted advised me to file a complaint with the Nevada Real Estate Division to generate an investigation of Berkshire Hathaway and their handling of this situation.

Craig, you and I have been friends for a long time, and I do not want to do that unless it is absolutely necessary. I would simply like your assistance in seeing that all my efforts of stewardship over this property over two plus years are not disparaged. Remember I cooperated with you at every turn over months no matter where I was in the world to try to get a sale that would allow you to earn a commission. Now, I would appreciate your assistance in promptly responding to my questions and assisting me in getting some appropriate financial remuneration for the Trust. Don't just walk away from me now.

Nona Tobin

(702)465-2199

EXHIBIT 18

Electronically Filed
8/11/2017 10:28 AM
Steven D. Grierson
CLERK OF THE COURT

JAKUB P. MEDRALA, ESQ.
Nevada Bar No. 12822
THE MEDRALA LAW FIRM, PROF. LLC
1091 S. Cimarron Road, Suite A-1
Las Vegas, Nevada 89145
(702) 475-8884
(702) 938-8625 Facsimile
jmedrala@medralaw.com
Attorney for Thomas Lucas and Opportunity Homes, LLC

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

JOEL A. STOKES and SANDRA F. STOKES, as Trustees of the JIMIJACK IRREVOCABLE TRUST, Plaintiffs, vs. BANK OF AMERICA, N.A.; SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC.; DOES I Through X, and ROES 1 Through 10, Inclusive, Defendants.	CASE NO.: A-15-720032-C DEPT. NO.: XXXI **NOTICE OF ENTRY OF ORDER GRANTING THOMAS LUCAS and OPPORTUNITY HOMES, LLC'S MOTION FOR SUMMARY JUDGMENT**
NATIONSTAR MORTGAGE, LLC, Counterclaimant, vs. JIMIJACK IRREVOCABLE TRUST; OPPORTUNITY HOMES, LLC, a Nevada Limited Liability Company; F. BONDURANT, LLC, a Nevada Limited Liability Company; DOES I Through X, and ROES XI Through XX, Inclusive, Counterdefendants,	
NONA TOBIN, an Individual and Trustee of the GORDON B. HANSEN TRUST, dated 8/22/25, Crossclaimant, vs. THOMAS LUCAS, and SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC.; DOES I Through X, and ROES I Through X, Inclusive, Crossdefendants.	

TO: ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD.

PLEASE TAKE NOTICE that an ORDER GRANTING THOMAS LUCAS and OPPORTUNITY HOMES, LLC'S MOTION FOR SUMMARY JUDGMENT was entered in the above-entitled action on the 9th day of August 2017.

A true and correct copy of said Order is attached hereto as Exhibit "1".

Dated this 11th day of August 2017.

THE MEDRALA LAW FIRM, PROF. LLC

/s/ Jakub P. Medrala
JAKUB P. MEDRALA, ESQ.
Nevada Bar No. 12822
1091 S. Cimarron Road, Suite A-1
Las Vegas, Nevada 89145
Attorney for Defendants/Counterclaimants Jaroslaw R. Jastrebski, Zachary England, and Robert Smith

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on August 11, 2017, I served a true and correct copy of the foregoing NOTICE OF ENTRY OF ORDER GRANTING THOMAS LUCAS and OPPORTUNITY HOMES, LLC'S MOTION FOR SUMMARY JUDGMENT via the E-Service Master List for the above-referenced matter in the Eighth Judicial District Court's e-filing system in accordance with the electronic service requirements of Administrative Order 14-2 and the Nevada Electronic Filing and Conversion Rules, and, if necessary, by depositing a copy of the same into the U.S. Postal Service at Las Vegas, Nevada, prepaid first-class postage affixed thereto, addressed to the following:

NONA TOBIN, *Pro Se*
2664 Olivia Heights Avenue
Henderson, Nevada 89052
Telephone: (702) 465-2199
nonatobin@gmail.com

By: */s/ Shuchi Patel*
An employee of THE MEDRALA LAW FIRM, PROF. LLC

EXHIBIT 1

Electronically Filed
8/9/2017 1:57 PM
Steven D. Grierson
CLERK OF THE COURT

JAKUB P. MEDRALA, ESQ.
Nevada Bar No. 12822
THE MEDRALA LAW FIRM, PROF. LLC
1091 S. Cimarron Road, Suite A-1
Las Vegas, Nevada 89145
(702) 475-8884
(702) 938-8625 Facsimile
jmedrala@medralaw.com
Attorney for Thomas Lucas and Opportunity Homes, LLC

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

JOEL A. STOKES and SANDRA F. STOKES, as Trustees of the JIMIJACK IRREVOCABLE TRUST, Plaintiffs, vs. BANK OF AMERICA, N.A.; SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC.; DOES I Through X, and ROES 1 Through 10, Inclusive, Defendants.	CASE NO.: A-15-720032-C DEPT. NO.: XXXI **ORDER GRANTING THOMAS LUCAS and OPPORTUNITY HOMES, LLC'S MOTION FOR SUMMARY JUDGMENT**
NATIONSTAR MORTGAGE, LLC, Counterclaimant, vs. JIMIJACK IRREVOCABLE TRUST; OPPORTUNITY HOMES, LLC, a Nevada Limited Liability Company; F. BONDURANT, LLC, a Nevada Limited Liability Company; DOES I Through X, and ROES XI Through XX, Inclusive, Counterdefendants,	
NONA TOBIN, an Individual and Trustee of the GORDON B. HANSEN TRUST, dated 8/22/25, Crossclaimant, vs. THOMAS LUCAS, and SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC.; DOES I Through X, and ROES I Through X, Inclusive, Crossdefendants.	

Counterdefendant Opportunity Homes, LLC, and Crossdefendant Thomas Lucas's Motion for Summary Judgment ("Motion for Summary Judgment") came on for hearing on April 27, 2017 at the hour of 9:30 a.m., Opportunity Homes and Thomas Lucas being represented by Jakub P. Medrala, Esq., of The Medrala Law Firm, PLLC and Crossclaimant Nona Tobin appearing *pro se*.

The Court having reviewed the pleadings and papers on file herein, having heard the arguments of counsel, and good cause appearing therefore, the Court issues the following Findings of Fact and Conclusions of Law, and Order:

FINDINGS OF FACT

On or about August 15, 2014, pursuant to NRS 116.3116 *et seq.*, Sun City Anthem Community Association, Inc. ("HOA") conducted a public auction and foreclosed on its lien for delinquent assessments on real property commonly known as 2763 White Sage Drive, Henderson, NV 89052, APN 191-13-811-052 ("the Property").

Opportunity Homes, LLC ("Opportunity Homes") was the highest bidder at the subject action and purchased its interest in the Property in exchange for $63,100.

Prior to the foreclosure, the Property's owner of record was Gordon B. Hansen, Trustee of the Gordon B. Hansen Trust, dated August 22, 2008.

Thereafter, on June 4, 2015, Opportunity Homes transferred its interest in the Property to F. Bondurant, LLC, by way of a Quitclaim Deed. Therefore, Opportunity Homes no longer claimed any interest in the Property.

Crossdefendant Thomas Lucas is a sole member of the Counterdefendant Opportunity Homes. Nona Tobin claims to be a "successor trustee" of the Gordon B. Hansen Trust, dated August 22, 2008.

Neither Opportunity Homes, nor Mr. Lucas has ever entered into any agreements with Nona Tobin.

Nona Tobin filed a crossclaim against Tom Lucas for quiet title to the Property, breach of contract, declaratory relief and civil conspiracy.

CONCLUSIONS OF LAW

1.0 STANDARD OF REVIEW

In Nevada, a party's motion for summary judgment must be granted, "if the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law." NRCP 56(c); *See also Wood v. Safeway, Inc.*, 121 Nev. 724, 731, 121 P.3d 1026, 1031 (2005) (rejecting the slightest doubt standard and adopting the federal standard set forth in *Liberty Lobby*, *Celotex*, and *Matsushita*). "[C]onclusory statements along with general allegations do not create an issue of fact." *Yeager v. Harrah's Club, Inc.*, 111 Nev. 830, 833, 897 P.2d 1093, 1095 (1995). Rather, a genuine issue of material fact exists only where the evidence is such that a reasonable trier of fact could return a verdict for the nonmoving party; other factual disputes are irrelevant. *Wood*, 121 Nev. at 731, 121 P.3d at 1031.

2.0 THOMAS LUCAS'S MOTION FOR SUMMARY JUDGMENT MUST BE GRANTED

A. Neither Opportunity Homes, LLC, Nor Thomas Lucas Claim Any Interest in the Subject Property; Therefore, Neither of Them Can Be a Part of a Quiet Title Action

An action for quiet title in real property is a statutory cause of action prescribed by NRS 40.010, which states:

> An action may be brought by any person against another who claims an estate or interest in real property, adverse to the person bringing the action, for the purpose of determining such adverse claim.

Thus, an action pursuant to NRS 40.010 requests a judicial determination of all adverse claims to disputed property. *Clay v. Scheeline Banking & Trust Co.*, 40 Nev. 9, 159 P. 1081, 1082-83 (1916).

From reading the express language of the statute, one of the elements of a quiet title action is that the defendant may claim "an estate or interest in real property, adverse to the person bringing the action." NRS. 40.010.

In the present case, neither Opportunity Homes nor Mr. Lucas claims any interest in the Property. While Opportunity Homes purchased the subject Property at the HOA auction on August 15, 2014, it also sold its interest in the Property on June 4 2015, to F. Bondurant, LLC.

Tobin's crossclaim for quiet title against Mr. Lucas[1] was filed on February 1, 2017, more than two years after Opportunity Homes sold its interest in the Property.

Accordingly, because neither Opportunity Homes nor Mr. Lucas claims any interest in the Property that is adverse to Tobin's interests, her quiet title claims against Mr. Lucas must be dismissed.

B. Neither Opportunity Homes, LLC, Nor Mr. Lucas Were Parties to Any Agreements With Tobin That They Could Possibly Breach

Under Nevada law, to prove a claim for breach of contract, the following elements must be proven: (1) the plaintiff and defendant entered into a valid and existing contract, (2) plaintiff performed or was excused from performance, (3) defendant failed to perform and was not

[1] Mr. Lucas has never claimed any interest in the Property. Instead, it was Mr. Lucas's company, Opportunity Homes, LLC, which purchased the Property at the subject foreclosure sale. However, Tobin did not join Opportunity Homes in her crossclaim, and it appears that she named Mr. Lucas on a theory that Opportunity Homes, LLC, is Mr. Lucas's alter ego (Crossclaim, ¶¶ 25-33). Although Mr. Lucas denies such allegations and that he registered Opportunity Homes, LLC, to "further . . . unfair enterprise and concealing and perpetuating unlawful conveyance of the Subject Property" as alleged in Paragraph 82 of the Crossclaim, whether or not Opportunity Homes, LLC, is Mr. Lucas's alter ego is immaterial to the issues raised in this action because neither Opportunity Homes nor Mr. Lucas claim any interest in the subject Property, and neither Opportunity Homes nor Mr. Lucas were parties to any agreements with Tobin.

excused from performance, and (4) plaintiff sustained damages as a result of the breach. *Calloway v. City of Reno*, 116 Nev. 250, 993 P.2d 1259 (2000).

In her crossclaim, Tobin alleges that she had an Exclusive Right to Sell (ER) listing agreement with Craig Leidy and Forest Barbee to list and sell the Property. She further alleges that Mr. Lucas is a real estate agent working under BHHS, and that: (1) he had actual or constructive knowledge that the beneficiary of the deed of trust refused to close multiple escrows (Crossclaim, ¶ 59); (2) he knew Nationstar was not the beneficiary of the deed of trust (*Id.*); (3) he told Leidy that he was the buyer, that he was going to keep the Property, and that he contacted Leidy before the sale of the property (Crossclaim, ¶ 60).

Not only do Tobin's allegations fail to state a claim for a breach of contract against Mr. Lucas, or even any other claim for relief as she did not allege any facts that would indicate that Mr. Lucas breached any legal obligations, but the main problem with Tobin's claim is that it does not allege that Mr. Lucas has entered into any agreement with Tobin that he could possibly breach. Indeed, Mr. Lucas has never entered into any agreements with Tobin.

While it is true that Mr. Lucas is a real estate licensee and an independent agent working with BHHS, BHHS is a real estate company that employs more than 800 real estate agents in Las Vegas valley alone, and Mr. Lucas is not bound by the agreements that Tobin could have signed with other BHHS's agents.

Tobin neither alleges any contractual relationship between her and Mr. Lucas, nor has she produced any evidence of a contractual relationship that could give rise to a breach of contract claim against him. Accordingly, no issue of material fact exists regarding whether Mr. Lucas breached any agreement with Tobin, and Tobin's claims must be dismissed.

C. Tobin Failed to Show Any Facts Indicating that Mr. Lucas Committed Civil Conspiracy.

To prevail in a civil conspiracy action in Nevada, plaintiff must prove an agreement between the tortfeasors; whether explicit or tacit, with an intent to accomplish an unlawful objective for the purpose of harming plaintiff; and that the plaintiff sustained damage resulting from defendants' act or acts. *Guilfoyle v. Olde Monmouth Stock Transfer Company, Co., Inc.*, 335 P.3d 190 (Nev. 2014); *Consol. Generator-Nevada, Inc. v. Cummins Engine Co.*, 114 Nev. 1304, 971 P. 2d 1251 (1999); *Dow Chemical Co. v. Mahlum*, 114 Nev. 1468, 970 P.2d 98 (1998).

In opposing Thomas Lucas and Opportunity Homes' Motion for Summary Judgment, Tobin failed to submit any evidence supporting her claim for civil conspiracy. Moreover, Tobin failed to even allege the existence of Mr. Lucas's agreement with anyone whose objective would be unlawful. Accordingly, her claim for civil conspiracy must be dismissed.

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ORDER

Based on the foregoing Findings of Facts and Conclusions of Law, the Court hereby **ORDERS, ADJUDGES AND DECREES** as follows:

1. Thomas Lucas and Opportunity Homes' Motion for Summary Judgment against Nona Tobin is **GRANTED**.
2. Nona Tobin's Crossclaim Against Thomas Lucas d/b/a Opportunity Homes, LLC is **DISMISSED** in its entirety.

Dated this 21 day of July, 2017.

for

DISTRICT COURT JUDGE Dept 31
HK

Respectfully submitted by:
The Medrala Law Firm, PLLC

Jakub P. Medrala, Esq. (SNB 12822)
1091 S. Cimarron Road, Ste. A-1
Las Vegas, Nevada 89145
Attorney for Thomas Lucas and Opportunity Homes, LLC

Approved as to form and content:

(Not signed)

NONA TOBIN, *Pro Se*
2664 Olivia Heights Avenue
Henderson, Nevada 89052
Telephone: (702) 465-2199
nonatobin@gmail.com

EXHIBIT 19

RRFS
RED ROCK FINANCIAL SERVICES

Red Rock Financial Services

Homeowner Progress Report

Sun City Anthem Community Association

Information as of: January 03, 2014

Red Rock Financial Service Account Number: 808634

Property Address: 2763 White Sage Dr, Henderson, NV 89052

Homeowner(s): The Gordon B. Hansen Trust, dated August 22, 2008;The Gordon B. Hansen Trust, dated August 22, 2008;SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC. ;WESTERN THRIFT & LOAN;MERS ;BANK OF AMERICA, N.A. ;WELLS FARGO BANK, N.A.

Progress Notes

9/13/2012	Account sent to Red Rock Financial Services to start the collection process
9/17/2012	Intent to Lien Letter sent via first class and certified mail. Homeowner has 30 days to reinstate the account before the Lien is prepared and recorded.
10/8/2012	Received correspondence via mail.
10/18/2012	Partial Payment received and processed.
11/5/2012	Response to The Estate of The Homeowner. advsied we received death certificate and to contact us within 30 days for payment arrangement.
12/5/2012	Lien prepared for recording.
12/13/2012	Lien sent for recording.
12/13/2012	Received payoff request via email from Ticor Title.
12/14/2012	Lien Recorded.
12/20/2012	A Title Company has requested a Payoff Demand. Payoff Demand Sent expires .
1/3/2013	Lien Letter sent via first class and certified mail. Recorded Lien enclosed. Homeowner has 30 days to reinstate the account before Red Rock will proceed with collection efforts.
1/9/2013	Received payoff request via email from Ticor Title.
1/16/2013	A Title Company has requested a Payoff Demand. Payoff Demand Sent expires 1/31/13 .
2/5/2013	Intent to Notice of Default sent via first class mail. Homeowner has 10 days to contact our office before the Notice of Default is prepared and recorded.
3/7/2013	Notice of Default prepared for recording.
3/14/2013	Notice of Default Recorded on 3/12/13.
3/15/2013	Notice of Default sent to Homeowner. The Notice of Default must mature for a minimum of 90 days before the Board may enforce the Notice of Default by setting a Sale.
3/27/2013	Rescission for Notice of Default prepared for recording due to mailing error.
3/27/2013	Set correct workflow due to mailing error
4/4/2013	Notice of Default prepared for recording.
4/10/2013	Notice of Default Recorded on 4/8/13.

© RED ROCK FINANCIAL SERVICES 4775 W. Teco Avenue, Suite 140, Las Vegas, NV 89118 Phone:(702) 932-6687 Fax:(702) 341-7733
Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

RRFS
RED ROCK FINANCIAL SERVICES

Red Rock Financial Services

Homeowner Progress Report

Sun City Anthem Community Association

Information as of: January 03, 2014

Red Rock Financial Service Account Number: 808634

Property Address: 2763 White Sage Dr, Henderson, NV 89052

Homeowner(s): The Gordon B. Hansen Trust, dated August 22, 2008;The Gordon B. Hansen Trust, dated August 22, 2008;SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC. ;WESTERN THRIFT & LOAN;MERS ;BANK OF AMERICA, N.A. ;WELLS FARGO BANK, N.A.

4/10/2013	Notice of Default sent to Homeowner. The Notice of Default must mature for a minimum of 90 days before the Board may enforce the Notice of Default by setting a Sale.
4/16/2013	4/16/13 Received Payoff request via email from Miles, Bauer, Bergstrom & Winters.
4/17/2013	Legal correspondence received via mail on 4/16/13
4/17/2013	Received correspondence via mail on 4/16/13
4/30/2013	wrong workflow
4/30/2013	A Title Company has requested a Payoff Demand. Payoff Demand Sent expires 5/15/13.
5/9/2013	duplicate entry
5/9/2013	Legal correspondence received no response required.
5/10/2013	Payment received from MBBW $825.00. Check returned as it does not pay the account in full.
5/16/2013	5/16/13 Received Payoff request via email from Proudfit Realty.
5/16/2013	Red rock will not be providing a response to the Legal Correspondence as the information has previously been provided to attorney.
5/29/2013	A Title Company has requested a Payoff Demand. Payoff Demand Sent expires 6/13/13.
6/25/2013	Intent to Notice of Sale sent via first class mail. The Homeowner has 30 days to reinstate the account before the Board of Directors will have the ability to proceed with the non-judicial foreclosure sale.
6/25/2013	Mortgage Letter sent via first class mail. Letter sent to Mortgage holder(s) to inform them of the Associations delinquent account status.
8/15/2013	Intent to Conduct Foreclosure sent via first class and certified mail. Homeowner has 10 business days to contact our office.
10/16/2013	Permission for Publication Packet sent to Management Company for Boards approval. Once the forms are returned signed, Red Rock will prepare the Notice of Sale and Post the Sale.
10/16/2013	Memo attached to Permission for Publication Packet.
1/3/2014	Memo attached to Permission for Publication Packet.
1/3/2014	Permission for Publication Packet sent to Management Company for Boards approval. Once the forms are returned signed, Red Rock will prepare the Notice of Sale and Post the Sale.

© RED ROCK FINANCIAL SERVICES 4775 W. Teco Avenue, Suite 140, Las Vegas, NV 89118 Phone:(702) 932-6887 Fax:(702) 341-7733
Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Electronically Filed
2/12/2019 12:55 PM
Steven D. Grierson
CLERK OF THE COURT

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Attorney for Nationstar Mortgage LLC

DISTRICT COURT

CLARK COUNTY, NEVADA

JOEL STOKES and SANDRA F. STOKES, as trustees of the JIMIJACK IRREVOCABLE TRUST, Plaintiff, vs. BANK OF AMERICA, N.A.; SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC.; DOES I through X and ROE BUSINESS ENTITIES I through X, inclusive, Defendants.	Case No.: A-15-720032-C Consolidated with: A-16-730078-C Dept. No.: XXXI **NATIONSTAR MORTGAGE LLC'S LIMITED JOINDER TO SUN CITY ANTHEM COMMUNITY ASSOCIATION'S MOTION FOR SUMMARY JUDGMENT**
NATIONSTAR MORTGAGE, LLC Counter-Claimant, vs. JIMIJACK IRREVOCABLE TRUST; OPPORTUNITY HOMES, LLC, a Nevada limited liability company; F. BONDURANT, LLC, a Nevada limited liability company; DOES I through X, inclusive; and ROE CORPORATIONS XI through XX, inclusive, Counter-Defendants.	

AKERMAN LLP
1635 VILLAGE CENTER CIRCLE, SUITE 200
LAS VEGAS, NEVADA 89134
TEL.: (702) 634-5000 – FAX: (702) 380-8572

NONA TOBIN, an individual, and Trustee of the GORDON B. HANSEN TRUST. Dated 8/22/08
Counter-Claimant,
vs.

JOEL A. STOKES and SANDRA F. STOKES, as trustees of the JIMIJACK IRREVOCABLE TRUST,

Counter-Defendants.

NONA TOBIN, an individual, and Trustee of the GORDON B. HANSEN TRUST. Dated 8/22/08
Cross-Claimant,
vs.

SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC., DOES 1-10, AND ROE CORPORATIONS 1-10, inclusive,

Counter-Defendants.

NONA TOBIN, an individual, and Trustee of the GORDON B. HANSEN TRUST. Dated 8/22/08
Cross-Claimant,
vs.

OPPORTUNITY HOMES, LLC, THOMAS LUCAS, Manager,

Counter-Defendant.

NONA TOBIN, an individual, and Trustee of the GORDON B. HANSEN TRUST. Dated 8/22/08
Cross-Claimant,
vs.

YUEN K. LEE, an Individual, d/b/a Manager, F. BONDURANT, LLC,

Counter-Defendant.

AKERMAN LLP
1635 VILLAGE CENTER CIRCLE, SUITE 200
LAS VEGAS, NEVADA 89134
TEL.: (702) 634-5000 – FAX: (702) 380-8572

Defendant in Intervention/Counterclaimant, Nationstar Mortgage LLC, submits its limited joinder to Cross-Defendant Sun City Anthem Community Association's (the **HOA**) motion for summary judgment, filed February 5, 2019, pursuant to EDCR 2.20(d).

Nationstar adopts the statement of undisputed material facts, arguments, and legal authority set forth in the HOA's motion as though fully set forth herein to the extent they establish the absence of a genuine issue of material fact that the HOA conducted a proper foreclosure of the sub-priority portion of its lien. The motion does not address the effect of the HOA's foreclosure on the deed of trust recorded July 22, 2004. However, out of an abundance of caution, Nationstar expressly reserves the right to challenge the HOA's foreclosure to the extent any party claims it extinguished the deed of trust. Nationstar maintains that the superpriority lien was satisfied and, therefore, discharged due to Miles Bauer's pre-sale tender.[1] Nationstar intends to separately move for summary judgment prior to the April 1, 2019 dispositive motion deadline but files this Joinder in furtherance of narrowing the issues of this case.

Dated: February 12, 2019

AKERMAN LLP

/s/Melanie D. Morgan
MELANIE D. MORGAN, ESQ.
Nevada Bar No. 8215
THERA A. COOPER, ESQ.
Nevada Bar No. 13468
1635 Village Center Circle, Suite 200
Las Vegas, Nevada 89134

Attorneys for Nationstar Mortgage LLC

[1] As confirmed by the Nevada Supreme Court in *Bank of America v. SFR Investments Pool 1, LLC*, 134 Nev. Adv. Op. 72, at 2 (September 13, 2018), the superpriority portion of the HOA's lien was extinguished prior to the HOA foreclosure because then loan servicer Bank of America, N.A. tendered an amount in excess of the superpriority amount of the HOA's lien prior to the foreclosure sale. A true and correct copy of Nationstar's tender evidence is attached hereto as **Exhibit A**.

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LAS VEGAS, NEVADA 89134
TEL.: (702) 634-5000 – FAX: (702) 380-8572

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12th day of February, 2019 and pursuant to NRCP 5(b), I served via the Clark County electronic filing system a true and correct copy of the foregoing **NATIONSTAR MORTGAGE LLC'S LIMITED JOINDER TO SUN CITY ANTHEM COMMUNITY ASSOCIATION'S MOTION FOR SUMMARY JUDGMENT**, addressed to:

Michael R. Mushkin & Associates	
L. Joe Coppedge	joe@mushlaw.com
Karen L. Foley	karen@mushlaw.com
Michael R. Mushkin	michael@mushlaw.com
Lipson Neilson P.C.	
Susana Nutt	snutt@lipsonneilson.com
Renee Rittenhouse	rrittenhouse@lipsonneilson.com
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/s/ Jill Sallade
An employee of AKERMAN LLP

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EXHIBIT A

EXHIBIT A

MILES, BERGSTROM & WINTERS, LLP AFFIDAVIT

State of California }
}ss.
Orange County }

Affiant being first duly sworn, deposes and says:

1. I am a managing partner with the law firm of Miles, Bergstrom & Winters, LLP formerly known as Miles, Bauer, Bergstrom & Winters, LLP (**Miles Bauer**) in Costa Mesa, California. I am authorized to submit this affidavit on behalf of Miles Bauer.

2. I am over 18 years of age, of sound mind, and capable of making this affidavit.

3. Miles Bauer uses ProLaw software to record and track all documents prepared and correspondence sent in connection to a particular file. ProLaw is recognized in the legal industry as a standard software platform for electronic document management and retention. Miles Bauer creates a separate electronic folder on ProLaw for each of its files. Within the folder, Miles Bauer maintains record of communications with its clients and third parties, including, but not limited to, borrowers and homeowners' associations. Miles Bauer also creates and records notes in its ProLaw folders, documenting the status and progress of the related files.

4. The information in this affidavit is taken from Miles Bauer's business records, including records maintained in ProLaw. I have personal knowledge of Miles Bauer's procedures for creating these records. They are: (a) made at or near the time of the occurrence of the matters recorded by persons with personal knowledge of the information in the business record, or from information transmitted by persons with personal knowledge; (b) kept in the course of Miles Bauer's regularly conducted business activities; and (c) it is the regular practice of Miles Bauer to make such records. I have personal knowledge of Miles Bauer's procedures for creating and maintaining these business records. I personally confirmed that the information in this affidavit is accurate by reading

the affidavit and attachments, and checking that the information in this affidavit matches Miles Bauer's records available to me.

5. Bank of America, N.A. (**BANA**) retained Miles Bauer to tender payments to homeowners associations (**HOA**) to satisfy super-priority liens in connection with the following loan:

Loan Number: [redacted]4234

Borrower(s): Estate of Gordon Hansen

Property Address: 2763 White Sage Drive, Henderson, Nevada 89052

6. Attached hereto as **Exhibit 1** is a true and correct copy of the ProLaw screenshot of the folder created for this particular loan and borrower. This screenshot is taken directly from ProLaw and reflects Miles Bauer's activity for this particular loan and borrower. I have personal knowledge of Miles Bauer's procedures for creating ProLaw folders. They are: (a) made before or near the time of the occurrence of the matters recorded by persons with personal knowledge of the information stored therein, or from information transmitted by persons with personal knowledge; (b) kept in the course of Miles Bauer's regularly conducted business activities; and (c) it is the regular practice of Miles Bauer to make such ProLaw folders to store and organize all Miles Bauer records for individual files. I have personal knowledge of Miles Bauer's procedures for creating and maintaining these business records. I personally confirmed the information in the ProLaw screenshot is an accurate representation of Miles Bauer's activity by reading the screenshot, and checking that the screenshot information matches Miles Bauer's records available to me.

7. Miles Bauer maintains records for the loan in connection with tender payments to HOA. As part of my job responsibilities for Miles Bauer, I am familiar with the type of records maintained by Miles Bauer in connection with the loan.

8. Based on Miles Bauer's business records, attached as **Exhibit 2** is a copy of an April 8, 2013 letter from Rock K. Jung, Esq., an attorney with Miles Bauer, to Sun City Anthem Community Association, care of Red Rock Financial Services.

9. Based on Miles Bauer's business records, attached as **Exhibit 3** is a copy of a Statement of Account from Red Rock Financial Services dated April 30, 2013 received by Miles Bauer in response to the letter identified above.

10. Based on Miles Bauer's business records, attached as **Exhibit 4** is a copy of an May 9, 2013 letter from Mr. Jung to Red Rock Financial Services enclosing a check for $825.00.

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11. Based on Miles Bauer's business records, Red Rock Financial Services returned the $825.00 check to Miles Bauer. A copy of a screenshot containing the relevant case management note confirming the check was rejected is attached as **Exhibit 1.**

FURTHER DECLARANT SAYETH NOT.

Date: 3/22/18

Declarant Douglas E. Miles

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Orange

Subscribed and sworn to (or affirmed) before me on this 22nd day of March, 2018,

by Douglas E. Miles, proved to me on the basis of satisfactory evidence to be
(Name of Signer)

the person who appeared before me.

Signature _____ (Seal)
(Signature of Notary Public)

AMANDA MARIA MENDOZA
Commission # 2078315
Notary Public - California
Los Angeles County
My Comm. Expires Aug 17, 2018

Exhibit 1

Matter ID: 13-H0518 | Desc.: Hansen, Gordon Estate of Sun City Anthem CA / RR
Client Sort: BANK OF AMERICA, N.A. (CWF)

General | Notes | Billing | Contacts | Matters | Events | Inquiry | Settlement | Civil | Contract Info | Custom | Deed Info | New Invoice

Date | (all)
1/1/2004 | 8/23/2004

- 4/5/2013: EMF RKJ re: New Referral Confirmation - Hansen
- 4/5/2013: EMT Clnt re: New Referral - Hansen
- 4/5/2013: RCVD REFERRAL; OPENED 4/5
- 4/5/2013: LTR - HOA HD
- 4/8/2013: 4/8 EMT CLIENT WITH INITIAL LETTERS ATTACHED; FU
- 4/8/2013: EMF RKJ re: Initial letters re 13-H0518 (HANSEN)
- 4/8/2013: SIGNED LETTERS- 4 8 13.pdf
- 4/8/2013: ENVELOPES SENT- 4 8 13.pdf
- 4/23/2013: 4/23 EMT CLIENT RE HOA UPDATE BUT NO PO; FU
- 4/23/2013: EMF RKJ re: Status Update
- 5/1/2013: EMT trustee re: homeowner attempting payment plan
- 5/1/2013: EMF Trustee re: h/o not in contact with trustee
- 5/1/2013: 5/1 EMT CLIENT RE HOA UPDATE WITH PO ATTACHED; FU
- 5/2/2013: EMF RKJ re: Payment Request Status Update re: 13-H0518 (1st) (HA
- 5/2/2013: EMF RKJ - Delivery Status Notification Delay/Payment Request Status Up
- 5/3/2013: EMF Clnt re: RE: Payment Request Status Update re: 13-H0518 (1st)
- 5/10/2013: 5/10 CHECK SENT TO HOA; FU 6/5 SEE IF CHECK WAS
- 5/13/2013: ACKNOWLEDGEMENT SHEET- 05/10/13.pdf
- 5/14/2013: Payoff Funds re: 13-H0518 - 2763 White Sage Dr. - Guiinder Sarao
- 5/22/2013: 2763 White Sage Drive, Ltr & Chk.pdf
- 6/3/2013: EMT Trustee re: asking status of checks
- 6/4/2013: EMF Clnt re: Status Update: Payoff Funds re: 13-H0518 - 2763 White
- 6/5/2013: EMF RKJ re: Closing file/Payoff Rejected, 13-H0518, 2763 White Sage Dr
- 6/5/2013: EMF CLNT re: Closing file
- 6/12/2013: EMF AWB re: Voided HOA Checks
- 6/12/2013: Rejected Check 06/05/13.pdf
- 6/14/2013: HOA REFUNDS TO BANA- 06/12/13; Mailed [certified]-
- 6/25/2013: EMT CLNT re: sent invoice #442800

Document | Preview
Date: 4/5/2013
Notes:
EMF RKJ re: New Refe

Exhibit 2

DOUGLAS E. MILES
Also Admitted in California & Illinois
JEREMY T. BERGSTROM
Also Admitted in Arizona
GINA M. CORENA
ROCK K. JUNG
KRISTA J. NIELSON
JORY C. GARABEDIAN
THOMAS M. MORLAN
Admitted in California
STEVEN E. STERN
Admitted in Arizona & Illinois
ANDREW H. PASTWICK
Also Admitted in Arizona & California
PATERNO C. JURANI

MILES, BAUER, BERGSTROM & WINTERS, LLP
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RICHARD J. BAUER, JR.
FRED TIMOTHY WINTERS
KEENAN E. McCLENAHAN
MARK T. DOMEYER
Also Admitted in the District of Columbia & Virginia
TAMI S. CROSBY
L. BRYANT JAQUEZ
VY T. PHAM
HADI R. SEYED-ALI
BRIAN H. TRAN
CORI B. JONES
CATHERINE K. MASON
CHRISTINE A. CHUNG
HANH T. NGUYEN
S. SHELLY RAISZADEH
SHANNON C. WILLIAMS
LAWRENCE R. BOIVIN
RICK J. NEHORAOFF
BRIAN M. LUNA
RODRIGO SUAREZ
Also licensed in Texas & El Salvador
KRISTIN C. DERR

April 8, 2013

Sun City Anthem Community Association
Red Rock Financial Services
4775 W. Teco Ave., Ste. #140
Las Vegas, NV 89118

Re: *Property Address: 2763 White Sage Drive, Henderson, NV 89052*
MBBW File No.: 13-H0518

Dear Sir or Madam:

This letter is written in response to your Notice of Default with regard to the HOA assessments purportedly owed on the above described real property and in response to **The Nevada Real Estate Division's most recent Advisory Opinion (Opinion No. 13-01) regarding the "Super Priority Lien"**. This firm represents the interests of MERS as nominee for Bank of America, N.A., as successor by merger to BAC Home Loans Servicing, LP (hereinafter "BANA") with regard to these issues. BANA is the beneficiary/servicer of the first deed of trust loan secured by the property.

As you know, NRS 116.3116 governs liens against units for assessments. Pursuant to NRS 116.3116:

> The association has a lien on a unit for:
>
> ...
>
> *any penalties, fees, charges, late charges, fines and interest charged pursuant to paragraphs (j) to (n), inclusive, of subsection 1 of NRS 116.3102 are enforceable as assessments under this section*

While the HOA may claim a lien under NRS 116.3102 Subsection (1), Paragraphs (j) through (n) of this Statute clearly provide that such a lien is JUNIOR to first deeds of trust to the extent the lien is for fees and charges imposed for collection and/or attorney fees, collection costs, late fees, service charges and interest. See Subsection 2(b) of NRS 116.3116, which states in pertinent part:

2. A lien under this section is prior to all other liens and encumbrances on a unit except:

(b) A first security interest on the unit recorded before the date on which the assessment sought to be enforced became delinquent...

The lien is also prior to all security interests described in paragraph (b) to the extent of the assessments for common expenses...which would have become due in the absence of acceleration during the 9 months immediately preceding institution of an action to enforce the lien.

Subsection 2b of NRS 116.3116 clearly provides that an HOA lien "is prior to all other liens and encumbrances on a unit except: a first security interest on the unit..." But such a lien is prior to a first security interest to the extent of the assessments for common expenses which would have become due during the 9 months before institution of an action to enforce the lien.

The aforementioned Nevada Real Estate Division's Advisory Opinion No. 13-01 regarding the "Super Priority Lien" unequivocally states: "The association's lien does not include 'costs of collecting' defined by NRS 116.310313, so the super priority portion of the lien may not include such costs." Furthermore, said Advisory Opinion goes on to say: "The super priority lien based on assessments may not exceed 9 months of assessments as reflected in the association's budget, and it may not include penalties, fees, late charges, fines, or interest."

Based on Section 2(b), a portion of your HOA lien is arguably senior to BANA's first deed of trust, specifically the nine months of assessments for common expenses incurred before the date of your notice of delinquent assessment dated March 7, 2013. For purposes of calculating the nine-month period, the trigger date is the date the HOA sought to enforce its lien. It is unclear, based upon the information known to date, what amount the nine months' of common assessments pre-dating the NOD actually are. That amount, whatever it is, is the amount BANA should be required to rightfully pay to fully discharge its obligations to the HOA per NRS 116.3102 and my client hereby offers to pay that sum upon presentation of adequate proof of the same by the HOA.

Please let me know what the status of any HOA lien foreclosure sale is, if any. My client does not want these issues to become further exacerbated by a wrongful HOA sale and it is my client's goal and intent to have these issues resolved as soon as possible. Please refrain from taking further action to enforce this HOA lien until my client and the HOA have had an opportunity to speak to attempt to fully resolve all issues.

Thank you for your time and assistance with this matter. I may be reached by phone directly at (702) 942-0412. Please fax the breakdown of the HOA arrears to my attention at (702) 942-0411. I will be in touch as soon as I've reviewed the same with BANA.

Sincerely,

MILES, BAUER, BERGSTROM & WINTERS, LLP

Rock K. Jung, Esq.

Exhibit 3

RRFS
RED ROCK FINANCIAL SERVICES

Numbers of Pages _____

April 30, 2013

Miles, Bauer, Bergstrom & Winters LLP
Attn: Diane Brown
Via Email: dbrown@mileslegal.com

Re: 2763 White Sage Dr, Henderson, NV 89052
Sun City Anthem Community Association / R808634

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

In response to your request for payoff figures for the above reference account, the following accounting ledger is a breakdown for the payoff request.

The current balance is $2,904.26. This demand and its balance due will expire on 5/15/13. You MUST request an update as this balance will only be valid through the date above. Payment received after the expiration date will not be accepted if the balance has changed. Failure to remit the balance by the expiration date may result in the continuation of the collection process at an additional cost. Check(s) should be made payable to Red Rock Financial Services and mailed to the address below.

Sun City Anthem Community Association and/or the management company's set up fees, as well as other fees and costs that are due at closing, if any, such as future assessments, are not included. You must contact RMI Management directly at www.rmillc.com to request their demand statement for those additional amounts prior to closing.

If you have any questions, please contact our office at 702-932-6887.

Regards,

Red Rock Financial Services

702.932.6887 | fax 702.341.7733 | 4775 W. Teco Avenue, Suite 140, Las Vegas, Nevada 89118 | www.rrfs.com

By sending your check, please be aware that you are authorizing Red Rock Financial Services to use the information on your check to make a one-time electronic debit from your account at the financial institution indicated on your check. This electronic debit will be for the amount of your check; no additional amount will be added to the amount. (If we cannot collect your electronic payment, we will issue a draft against your account.) Please contact the Accounts Receivable department at (702) 932-6887 to learn about other payment options should you prefer to not have your payment processed in this manner.

Form **W-9**
(Rev. December 2011)
Department of the Treasury
Internal Revenue Service

Request for Taxpayer Identification Number and Certification

Give Form to the requester. Do not send to the IRS.

Print or type
See Specific Instructions on page 2.

Name (as shown on your income tax return)
RMI Management, LLC

Business name/disregarded entity name, if different from above
Red Rock Financial Services

Check appropriate box for federal tax classification:
☐ Individual/sole proprietor ☐ C Corporation ☐ S Corporation ☑ Partnership ☐ Trust/estate

☐ Limited liability company. Enter the tax classification (C=C corporation, S=S corporation, P=partnership) ▶

☐ Other (see instructions) ▶

☐ Exempt payee

Address (number, street, and apt. or suite no.)
4775 W Teco Ave. Suite #140

Requester's name and address (optional)

City, state, and ZIP code
Las Vegas, NV 89118

List account number(s) here (optional)

Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on the "Name" line to avoid backup withholding. For individuals, this is your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the Part I instructions on page 3. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN* on page 3.

Note. If the account is in more than one name, see the chart on page 4 for guidelines on whose number to enter.

Social security number
☐☐☐ - ☐☐ - ☐☐☐☐

Employer identification number
8 8 - 0 3 5 8 1 3 2

Part II Certification

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding, and
3. I am a U.S. citizen or other U.S. person (defined below).

Certification instructions. You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions on page 4.

Sign Here Signature of U.S. person ▶ Date ▶

General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

Purpose of Form

A person who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) to report, for example, income paid to you, real estate transactions, mortgage interest you paid, acquisition or abandonment of secured property, cancellation of debt, or contributions you made to an IRA.

Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN to the person requesting it (the requester) and, when applicable, to:

1. Certify that the TIN you are giving is correct (or you are waiting for a number to be issued),
2. Certify that you are not subject to backup withholding, or
3. Claim exemption from backup withholding if you are a U.S. exempt payee. If applicable, you are also certifying that as a U.S. person, your allocable share of any partnership income from a U.S. trade or business is not subject to the withholding tax on foreign partners' share of effectively connected income.

Note. If a requester gives you a form other than Form W-9 to request your TIN, you must use the requester's form if it is substantially similar to this Form W-9.

Definition of a U.S. person. For federal tax purposes, you are considered a U.S. person if you are:

- An individual who is a U.S. citizen or U.S. resident alien,
- A partnership, corporation, company, or association created or organized in the United States or under the laws of the United States,
- An estate (other than a foreign estate), or
- A domestic trust (as defined in Regulations section 301.7701-7).

Special rules for partnerships. Partnerships that conduct a trade or business in the United States are generally required to pay a withholding tax on any foreign partners' share of income from such business. Further, in certain cases where a Form W-9 has not been received, a partnership is required to presume that a partner is a foreign person, and pay the withholding tax. Therefore, if you are a U.S. person that is a partner in a partnership conducting a trade or business in the United States, provide Form W-9 to the partnership to establish your U.S. status and avoid withholding on your share of partnership income.

RRFS
RED ROCK FINANCIAL SERVICES

Red Rock Financial Services

Accounting Ledger

Information as of: April 30, 2013

Account Number: 808634
Association: Sun City Anthem Community Association
Property Address: 2763 White Sage Dr, Henderson, NV 89052
Ledger Balance: $2,876.95
Homeowner(s): The Gordon B. Hansen Trust, dated August 22, 2008;The Gordon B. Hansen Trust, dated August 22, 2008;SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC. ;WESTERN THRIFT & LOAN;MERS ;BANK OF AMERICA, N.A. ;WELLS FARGO BANK, N.A.

Posting	Description	Amount	Balance	Pmt Ref	Memo
1/1/2006	Quarterly Assessment	$235.00	$235.00		Conversion
2/1/2006	Association Mgmt Payment	($235.00)	$0.00		Conversion
4/1/2006	Quarterly Assessment	$235.00	$235.00		Billing
4/18/2006	Association Mgmt Payment	($235.00)	$0.00		Batch Adjustment
7/1/2006	Quarterly Assessment	$235.00	$235.00		Billing
7/12/2006	Association Mgmt Payment	($235.00)	$0.00		Batch Adjustment
10/1/2006	Quarterly Assessment	$235.00	$235.00		Billing
10/26/2006	Association Mgmt Payment	($235.00)	$0.00		Batch Adjustment
1/1/2007	Quarterly Assessment	$235.00	$235.00		Billing
1/11/2007	Association Mgmt Payment	($235.00)	$0.00		Batch Adjustment
3/8/2007	Association Mgmt Payment	($235.00)	($235.00)		Batch Adjustment
4/1/2007	Quarterly Assessment	$235.00	$0.00		Billing
6/8/2007	Association Mgmt Payment	($235.00)	($235.00)		Batch Adjustment
7/1/2007	Quarterly Assessment	$235.00	$0.00		Billing
10/1/2007	Sun City Anthem QT Assmt	$235.00	$235.00		Sun City Anthem Quarterly Assessment
10/11/2007	Association Mgmt Payment	($235.00)	$0.00	1873	Receipt Processing
1/1/2008	Sun City Anthem QT Assmt	$275.00	$275.00		Sun City Anthem Quarterly Assessment
1/11/2008	Association Mgmt Payment	($275.00)	$0.00	6761	Receipt Processing
3/1/2008	Special Assessment	($81.32)	($81.32)		Reverse Fence Painting
3/1/2008	Special Assessment	$81.32	$0.00		Fence Painting
4/1/2008	Sun City Anthem QT Assmt	$275.00	$275.00		Sun City Anthem QT Assmt
4/8/2008	Association Mgmt Payment	($275.00)	$0.00	3313	Receipt Processing
6/1/2008	Unit Repair	$81.32	$81.32		Fence Painting
6/25/2008	Association Mgmt Payment	($81.32)	$0.00	2044	Receipt Processing
7/1/2008	Sun City Anthem QT Assmt	$275.00	$275.00		Sun City Anthem QT Assmt
7/11/2008	Association Mgmt Payment	($275.00)	$0.00	6578	Receipt Processing
9/25/2008	Association Mgmt Payment	($175.00)	($175.00)	02057	Lockbox Payment
10/1/2008	Sun City Anthem QT Assmt	$175.00	$0.00		Sun City Anthem QT Assmt

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Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

NSM0240

RRFS
RED ROCK FINANCIAL SERVICES

Red Rock Financial Services
Accounting Ledger
Information as of: April 30, 2013

Account Number: 808634
Association: Sun City Anthem Community Association
Property Address: 2763 White Sage Dr, Henderson, NV 89052
Ledger Balance: $2,876.95
Homeowner(s): The Gordon B. Hansen Trust, dated August 22, 2008;The Gordon B. Hansen Trust, dated August 22, 2008;SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC. ;WESTERN THRIFT & LOAN;MERS ;BANK OF AMERICA, N.A. ;WELLS FARGO BANK, N.A.

Posting	Description	Amount	Balance	Pmt Ref	Memo
12/31/2008	Association Mgmt Payment	($240.00)	($240.00)	02074	Lockbox Payment
1/1/2009	Sun City Anthem QT Assmt	$240.00	$0.00		Sun City Anthem QT Assmt
4/1/2009	Sun City Anthem QT Assmt	$240.00	$240.00		Sun City Anthem QT Assmt
4/7/2009	Association Mgmt Payment	($240.00)	$0.00	02090	Lockbox Payment
7/1/2009	Sun City Anthem QT Assmt	$240.00	$240.00		Sun City Anthem QT Assmt
7/13/2009	Association Mgmt Payment	($240.00)	$0.00	23791	Lockbox Payment
10/9/2009	Association Mgmt Payment	($240.00)	($240.00)	97004	Lockbox Payment
1/1/2010	Sun City Anthem QT Assmt	$240.00	$0.00		Sun City Anthem QT Assmt
1/25/2010	Association Mgmt Payment	($240.00)	($240.00)	10803	Lockbox Payment
4/1/2010	Sun City Anthem QT Assmt	$240.00	$0.00		Sun City Anthem QT Assmt
7/1/2010	Sun City Anthem QT Assmt	$240.00	$240.00		Sun City Anthem QT Assmt
7/30/2010	Late Fees	$25.00	$265.00		Late Fees
8/16/2010	Association Mgmt Payment	($265.00)	$0.00	63164	Lockbox Payment
10/7/2010	Association Mgmt Payment	($240.00)	($240.00)	98965	Lockbox Payment
1/1/2011	Sun City Anthem QT Assmt	$250.00	$10.00		Sun City Anthem QT Assmt
2/18/2011	Association Mgmt Payment	($10.00)	$0.00	84899	Lockbox Payment
4/1/2011	Sun City Anthem QT Assmt	$250.00	$250.00		Sun City Anthem QT Assmt
4/30/2011	Late Fees	$25.00	$275.00		Late Fees
5/20/2011	Association Mgmt Payment	($275.00)	$0.00	02215	Lockbox Payment
7/1/2011	Sun City Anthem QT Assmt	$250.00	$250.00		Sun City Anthem QT Assmt
7/30/2011	Late Fees	$25.00	$275.00		Late Fees
8/18/2011	Association Mgmt Payment	($275.00)	$0.00	02227	Lockbox Payment
10/1/2011	Sun City Anthem QT Assmt	$250.00	$250.00		Sun City Anthem QT Assmt
10/11/2011	Association Mgmt Payment	($240.00)	$10.00	52791	Lockbox Payment
11/22/2011	Association Mgmt Payment	($10.00)	$0.00	61105	Lockbox Payment
1/1/2012	Sun City Anthem QT Assmt	$275.00	$275.00		Sun City Anthem QT Assmt
1/30/2012	Late Fees	$25.00	$300.00		Late Fees
2/21/2012	Association Mgmt Payment	($300.00)	$0.00	00112	Lockbox Payment

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NSM0241

RRFS
RED ROCK FINANCIAL SERVICES

Red Rock Financial Services
Accounting Ledger
Information as of: April 30, 2013

Account Number: 808634
Association: Sun City Anthem Community Association
Property Address: 2763 White Sage Dr, Henderson, NV 89052
Ledger Balance: $2,876.95
Homeowner(s): The Gordon B. Hansen Trust, dated August 22, 2008;The Gordon B. Hansen Trust, dated August 22, 2008;SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC. ;WESTERN THRIFT & LOAN;MERS ;BANK OF AMERICA, N.A. ;WELLS FARGO BANK, N.A.

Posting	Description	Amount	Balance	Pmt Ref	Memo
4/1/2012	Sun City Anthem QT Assmt	$275.00	$275.00		Sun City Anthem QT Assmt
4/26/2012	Association Mgmt Payment	($275.00)	$0.00	127	Receipt Processing
7/1/2012	Sun City Anthem QT Assmt	$275.00	$275.00		Sun City Anthem QT Assmt
7/31/2012	Late Fees	$25.00	$300.00		Late Fees
8/31/2012	Late Fees	$25.00	$325.00		Late Fees
9/13/2012	Management Company Collection Cost	$150.00	$475.00		Management Company Collection Fee
9/17/2012	Intent to Lien Letter	$125.00	$600.00		
9/17/2012	Mailing Costs	$8.97	$608.97		
9/17/2012	Mailing Costs	$8.97	$617.94		
9/24/2012	Vendor Adjustment	($150.00)	$467.94		
9/30/2012	Late Fees	$25.00	$492.94		Late Fees
9/30/2012	Interest	$1.21	$494.15		Interest
10/1/2012	Sun City Anthem QT Assmt	$275.00	$769.15		Sun City Anthem QT Assmt
10/18/2012	Red Rock Partial Payment	($300.00)	$469.15	PC 143	Partial Payment
10/31/2012	Late Fees	$25.00	$494.15		Late Fees
11/30/2012	Late Fees	$25.00	$519.15		Late Fees
12/5/2012	Lien Recording Costs	$34.00	$553.15		
12/5/2012	Lien Release	$30.00	$583.15		
12/5/2012	Lien for Delinquent Assessment	$325.00	$908.15		
12/5/2012	Mailing Costs	$8.20	$916.35		
12/5/2012	Mailing Costs	$8.20	$924.55		
12/20/2012	Payoff Demand	$150.00	$1,074.55		Ticor Title
12/31/2012	Late Fees	$25.00	$1,099.55		Late Fees
12/31/2012	Interest	$1.10	$1,100.65		Interest
1/1/2013	Sun City Anthem QT Assmt	$275.00	$1,375.65		Sun City Anthem QT Assmt
1/16/2013	Payoff Demand	$50.00	$1,425.65		Ticor Title
1/31/2013	Late Fees	$25.00	$1,450.65		Late Fees
2/5/2013	Intent to NOD	$90.00	$1,540.65		

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Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

RRFS
RED ROCK FINANCIAL SERVICES

Red Rock Financial Services
Accounting Ledger
Information as of: April 30, 2013

Account Number: 808634
Association: Sun City Anthem Community Association
Property Address: 2763 White Sage Dr, Henderson, NV 89052
Ledger Balance: $2,876.95
Homeowner(s): The Gordon B. Hansen Trust, dated August 22, 2008;The Gordon B. Hansen Trust, dated August 22, 2008;SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC. ;WESTERN THRIFT & LOAN;MERS ;BANK OF AMERICA, N.A. ;WELLS FARGO BANK, N.A.

Posting	Description	Amount	Balance	Pmt Ref	Memo
3/2/2013	Late Fees	$25.00	$1,565.65		Late Fees
3/2/2013	Late Fees	($25.00)	$1,540.65		Sun City Anthem QT Assmt
3/7/2013	NOD Mailing Costs	$85.70	$1,626.35		
3/7/2013	Notice of Default	$400.00	$2,026.35		
3/7/2013	NOD Recording Costs	$22.00	$2,048.35		
3/7/2013	NOD Release	$30.00	$2,078.35		
3/7/2013	NOD Release Recording Costs	$22.00	$2,100.35		
3/7/2013	Trustee Sale Guarantee	$350.00	$2,450.35		
3/27/2013	Vendor Adjustment	($350.00)	$2,100.35		
3/27/2013	Red Rock Fee Adjustment	($559.70)	$1,540.65		
3/31/2013	Late Fees	$25.00	$1,565.65		Late Fees
3/31/2013	Interest	$2.31	$1,567.96		Interest
4/1/2013	Sun City Anthem QT Assmt	$275.00	$1,842.96		Sun City Anthem QT Assmt
4/4/2013	NOD Mailing Costs	$85.70	$1,928.66		
4/4/2013	Notice of Default	$400.00	$2,328.66		
4/4/2013	NOD Recording Costs	$22.00	$2,350.66		
4/4/2013	NOD Release	$30.00	$2,380.66		
4/4/2013	NOD Release Recording Costs	$22.00	$2,402.66		
4/4/2013	Trustee Sale Guarantee	$350.00	$2,752.66		
4/4/2013	NOD Mailing Charges Adjustment	($25.71)	$2,726.95		
4/30/2013	Payoff Demand	$150.00	$2,876.95		Miles Bauer
4/30/2013	Late Fees	$25.00	$2,901.95		
4/30/2013	Interest	$2.31	$2,904.26		

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Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Exhibit 4

DOUGLAS E. MILES
Also Admitted in California & Illinois
JEREMY T. BERGSTROM
Also Admitted in Arizona
GINA M. CORENA
ROCK K. JUNG
KRISTA J. NIELSON
JORY C. GARABEDIAN
THOMAS M. MORLAN
Admitted in California
STEVEN E. STERN
Admitted in Arizona & Illinois
ANDREW H. PASTWICK
Also Admitted in Arizona & California & New York
PATERNO C. JURANI

MILES, BAUER, BERGSTROM & WINTERS, LLP
ATTORNEYS AT LAW SINCE 1985

2200 Paseo Verde Pkwy., Suite 250
Henderson, NV 89052
Phone: (702) 369-5960
Fax: (702) 369-4955

CALIFORNIA OFFICE
1231 E. Dyer Road, Suite 100
Santa Ana, CA 92705
Phone: (714) 481-9100
Fax: (714) 481-9141

RICHARD J. BAUER, JR.
FRED TIMOTHY WINTERS
KEENAN E. McCLENAHAN
MARK T. DOMEYER
Also Admitted in the District of Columbia & Virginia
TAMI S. CROSBY
L. BRYANT JAQUEZ
VY T. PHAM
HADI R. SEYED-ALI
BRIAN H. TRAN
CORI B. JONES
CATHERINE K. MASON
S. SHELLY RAISZADEH
SHANNON C. WILLIAMS
LAWRENCE R. BOIVIN
RICK J. NEHORAOFF
BRIAN M. LUNA
RODRIGO SUAREZ
Also licensed in Texas & El Salvador
KRISTIN C. DERR
KATHERINE G. HEIDBRINK
Also licensed in Massachusetts & New York

May 9, 2013

RED ROCK FINANCIAL SERVICES
4775 W. Teco Avenue #140
Las Vegas, NV 89118

Re: *Property Address:* 2763 White Sage Drive
ACCT. #: R808634
LOAN # [redacted]4234
MBBW File No. 13-H0518

Dear Sir/Madame:

As you may recall, this firm represents the interests of Bank of America, N.A., as successor by merger to BAC Home Loans Servicing, LP (hereinafter "BANA") with regard to the issues set forth herein. We have received correspondence from your firm regarding our inquiry into the "Super-Priority Demand Payoff" for the above referenced property. The Statement of Account provided by you in regards to the above-referenced address shows a full payoff amount of $2,904.26. BANA is the beneficiary/servicer of the first deed of trust loan secured by the property and wishes to satisfy its obligations to the HOA.

As you are probably already aware, the State of Nevada Real Estate Division recently issued an Advisory Opinion addressing the components of the Super-Priority Amount that Nevada HOAs can recover.

Specifically, Nevada Real Estate Division's Advisory Opinion No. 13-01 regarding the "Super-Priority Lien" unequivocally states "The association's lien does not include 'costs of collecting' defined by NRS 116.310313, so the super-priority portion of the lien may not include such costs." Furthermore, said Advisory Opinion goes on to say: "The super-priority lien based on assessments may not exceed 9 months of assessments as reflected in the association's budget and it may not include penalties, fees late charges, fines or interest."

The Real Estates Division's opinion also seems to suggest that an association can foreclose on its super-priority lien and the first security interest holder will either pay the super-priority lien or risk losing its security interest.

Furthermore, please bear in mind that:

NRS 116.3116 governs liens against units for assessments. Pursuant to NRS 116.3116:

> The association has a lien on a unit for:
>
> ...
>
> *any penalties, fees, charges, late charges, fines and interest charged pursuant to paragraphs (j) to (n), inclusive, of subsection 1 of NRS 116.3102 are enforceable as assessments under this section*

While the HOA may claim a lien under NRS 116.3102 Subsection (1), Paragraphs (j) through (n) of this Statute clearly provide that such a lien is JUNIOR to first deeds of trust to the extent the lien is for fees and charges imposed for collection and/or attorney fees, collection costs, late fees, service charges and interest. See Subsection 2(b) of NRS 116.3116, which states in pertinent part:

> 2. A lien under this section is prior to all other liens and encumbrances on a unit except:
> (b) A first security interest on the unit recorded before the date on which the assessment sought to be enforced became delinquent...
>
> The lien is also prior to all security interests described in paragraph (b) <u>to the extent of the assessments for common expenses...which would have become due in the absence of acceleration during the 9 months immediately preceding institution of an action to enforce the lien</u>.

Based on said Advisory Opinion and Section 2(b), a portion of your HOA lien is arguably prior to BANA's first deed of trust, specifically only the nine months of assessments for common expenses incurred before the date of your notice of delinquent assessment. The payoff amount; however, given by you includes many fees that are not allowed to be included in the Super-Priority Amount, and thus are junior to our client's first deed of trust.

As a show of good-faith, our client has authorized us to make payment to you in the amount of $825.00 to satisfy its Super-Priority Amount obligations to the HOA as a holder of the first deed of trust against the property. Thus, enclosed you will find a cashier's check made out to Red Rock Financial Services in the sum of $825.00, which represents the maximum 9 months worth of delinquent assessments recoverable by an HOA against the first deed of trust lienholder. This is a non-negotiable amount and any endorsement of said cashier's check on your part, whether express or implied, will be strictly construed as an unconditional acceptance on your part of the facts stated herein and express agreement that BANA's financial obligations towards the HOA in regards to the real property located at 2763 White Sage Drive have now been "paid in full".

Please note, however, that any rejection on your part of said tender of the Super-Priority Amount will be construed as a waiver of any right by you, your client or any subsequent purchaser of the subject property at an HOA foreclosure sale to claim our client's lien was wiped out at said HOA sale. Additionally, please be advised that my client may also seek attorney's fees and costs for any litigation caused by your improper rejection of any payoff tender made pursuant to the Real Estate Division's Advisory Opinion.

Thank you for your prompt attention to this matter. If you have any questions or concerns, I may be reached by phone directly at (702) 942-0412.

Sincerely,

MILES, BAUER, BERGSTROM & WINTERS, LLP

Rock K. Jung, Esq.

Miles, Bauer, Bergstrom & Winters, LLP Trust Acct 13-H0518 Initials: SAC

Payee: RED ROCK FINANCIAL SERVICES Check #: 19235 Date: 5/8/2013 Amount: 825.00

Inv. Date	Reference #	Description	Inv. Amount	Case #	Matter Description	Cost Amount
5/8/2013	R808634	HOA Fees	825.00			

Miles, Bauer, Bergstrom & Winters, LLP
Trust Account
1231 E. Dyer Road, #100
Santa Ana, CA 92705
Phone: (714) 481-9100

Bank of America
1100 N. Green Valley Parkway
Henderson, NV 89074
16-66/1220
1020
13-H0518
Loan #[redacted]4234

19235

Date: 5/8/2013

Amount $***** 825.00

Check Void After 90 Days

Pay $******Eight Hundred Twenty-Five & No/100 Dollars
to the order of

RED ROCK FINANCIAL SERVICES

Security Features Included. Details on back.

⑈19235⑈ ⑆122400724⑆ 5010068769 73⑈

AA 000851

NSM0247

Exhibit 5

Miles, Bauer, Bergstrom & Winters, LLP Trust Acct 13-H0518 Initials: SAC

Payee: RED ROCK FINANCIAL SERVICES Check #: 19235 Date: 5/8/2013 Amount: 825.00

Inv. Date	Reference #	Description	Inv. Amount	Case #	Matter Description	Cost Amount
5/8/2013	R808634	HOA Fees	825.00		VOID	

Miles, Bauer, Bergstrom & Winters, LLP
Trust Account
1231 E. Dyer Road, #100
Santa Ana, CA 92705
Phone: (714) 481-9100

Bank of America
1100 N. Green Valley Parkway
Henderson, NV 89074
16-66/1220
1020
13-H0518
Loan # [redacted]4234

19235

Date: 5/8/2013

Amount $**** 825.00

Check Void After 90 Days

Pay $*****Eight Hundred Twenty-Five & No/100 Dollars
to the order of

RED ROCK FINANCIAL SERVICES

Security Features Included. Details on back.

⑈19235⑈ ⑆122400724⑆ 501006876973⑈

MILES, BERGSTROM & WINTERS, LLP BORROWER LETTER AFFIDAVIT

State of California }
}ss.
Orange County }

Affiant being first duly sworn, deposes and says:

1. I am a managing partner with the law firm of Miles, Bergstrom & Winters, LLP formerly known as Miles, Bauer, Bergstrom & Winters, LLP (**Miles Bauer**) in Costa Mesa, California. I am authorized to submit this affidavit on behalf of Miles Bauer.

2. I am over 18 years of age, of sound mind, and capable of making this affidavit.

3. Miles Bauer uses ProLaw software to record and track all documents prepared and correspondence sent in connection to a particular file. ProLaw is recognized in the legal industry as a standard software platform for electronic document management and retention. Miles Bauer creates a separate electronic folder on ProLaw for each of its files. Within the folder, Miles Bauer maintains record of communications with its clients and third parties, including, but not limited to, borrowers and homeowners' associations. Miles Bauer also creates and records notes in its ProLaw folders, documenting the status and progress of the related files.

4. The information in this affidavit is taken from Miles Bauer's business records, including records maintained in ProLaw. I have personal knowledge of Miles Bauer's procedures for creating these records. They are: (a) made at or near the time of the occurrence of the matters recorded by persons with personal knowledge of the information in the business record, or from information transmitted by persons with personal knowledge; (b) kept in the course of Miles Bauer's regularly conducted business activities; and (c) it is the regular practice of Miles Bauer to make such records. I have personal knowledge of Miles Bauer's procedures for creating and maintaining these business records. I personally confirmed that the information in this affidavit is accurate by reading

the affidavit and attachments, and checking that the information in this affidavit matches Miles Bauer's records available to me.

5. Bank of America, N.A. (**BANA**) retained Miles Bauer to tender payments to homeowners associations (**HOA**) to satisfy super-priority liens in connection with the following loan:

Loan Number: [redacted]4234

Borrower(s): Estate of Gordon Hansen

Property Address: 2763 White Sage Drive, Henderson, Nevada 89052

6. Attached hereto as **Exhibit 1** is a true and correct copy of the ProLaw screenshot of the folder created for this particular loan and borrower. This screenshot is taken directly from ProLaw and reflects Miles Bauer's activity for this particular loan and borrower. I have personal knowledge of Miles Bauer's procedures for creating ProLaw folders. They are: (a) made before or near the time of the occurrence of the matters recorded by persons with personal knowledge of the information stored therein, or from information transmitted by persons with personal knowledge; (b) kept in the course of Miles Bauer's regularly conducted business activities; and (c) it is the regular practice of Miles Bauer to make such ProLaw folders to store and organize all Miles Bauer records for individual files. I have personal knowledge of Miles Bauer's procedures for creating and maintaining these business records. I personally confirmed the information in the ProLaw screenshot is an accurate representation of Miles Bauer's activity by reading the screenshot, and checking that the screenshot information matches Miles Bauer's records available to me.

7. Miles Bauer maintains records for the loan in connection with tender payments to HOA. As part of my job responsibilities for Miles Bauer, I am familiar with the type of records maintained by Miles Bauer in connection with the loan.

8. Based on Miles Bauer's business records, attached as **Exhibit 2** is a copy of an April 8, 2013 letter from Rock K. Jung, Esq., an attorney with Miles Bauer, to Estate of Gordon Hansen, care of Gordon B. Hansen.

FURTHER DECLARANT SAYETH NOT.

Date: 3/22/18

Declarant Douglas E. Miles

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Orange

Subscribed and sworn to (or affirmed) before me on this 22nd day of March, 2018,

by Douglas E. Miles, proved to me on the basis of satisfactory evidence to be
(Name of Signer)

the person who appeared before me.

Signature _____ (Seal)
(Signature of Notary Public)

AMANDA MARIA MENDOZA
Commission # 2078315
Notary Public - California
Los Angeles County
My Comm. Expires Aug 17, 2018

Exhibit 1

Matter ID: 13-H0518 | Desc.: Hansen, Gordon Estate of Sun City Anthem CA / RR

Client Sort: BANK OF AMERICA, N.A. (CWF)

General | Notes | Billing | Contacts | Matters | Events | Inquiry | Settlement | Civil | Contract Info | Custom | Deed Info | New Invoice

Date | [all]

1/1/2004 | 8/23/2004

- 4/5/2013: EMF RKJ re: New Referral Confirmation - Hansen
- 4/5/2013: EMT Clnt re: New Referral - Hansen
- 4/5/2013: RCVD REFERRAL; OPENED 4/5
- 4/5/2013: LTR - HOA HD
- 4/8/2013: 4/8 EMT CLIENT WITH INITIAL LETTERS ATTACHED; FU
- 4/8/2013: EMF RKJ re: Initial letters re 13-H0518 (HANSEN)
- 4/8/2013: SIGNED LETTERS- 4 8 13.pdf
- 4/8/2013: ENVELOPES SENT- 4 8 13.pdf
- 4/23/2013: 4/23 EMT CLIENT RE HOA UPDATE BUT NO PO; FU
- 4/23/2013: EMF RKJ re: Status Update
- 5/1/2013: EMT trustee re: homeowner attempting payment plan
- 5/1/2013: EMF Trustee re: h/o not in contact with trustee
- 5/1/2013: 5/1 EMT CLIENT RE HOA UPDATE WITH PO ATTACHED; FU
- 5/2/2013: EMF RKJ re: Payment Request Status Update re: 13-H0518 (1st) (HA
- 5/2/2013: EMF RKJ - Delivery Status Notification Delay/Payment Request Status Up
- 5/3/2013: EMF Clnt re: RE: Payment Request Status Update re: 13-H0518 (1st)
- 5/10/2013: 5/10 CHECK SENT TO HOA; FU 6/5 SEE IF CHECK WAS
- 5/13/2013: ACKNOWLEDGEMENT SHEET- 05/10/13.pdf
- 5/14/2013: Payoff Funds re: 13-H0518 - 2763 White Sage Dr. - Gurinder Sarao
- 5/22/2013: 2763 White Sage Drive, Ltr & Chk.pdf
- 6/3/2013: EMT Trustee re: asking status of checks
- 6/4/2013: EMF Clnt re: Status Update: Payoff Funds re: 13-H0518 - 2763 White
- 6/5/2013: EMF RKJ re: Closing file/Payoff Rejected, 13-H0518, 2763 White Sage Dr
- 6/5/2013: EMF CLNT re: Closing file
- 6/12/2013: EMF AWB re: Voided HOA Checks
- 6/12/2013: Rejected Check 06/05/13.pdf
- 6/14/2013: HOA REFUNDS TO BANA- 06/12/13; Mailed [certified]
- 6/25/2013: EMT CLNT re: sent invoice #442800

Document | Preview

Date: 4/5/2013

Notes:

EMF RKJ re: New Refe

Exhibit 2

DOUGLAS E. MILES
Also Admitted in California & Illinois
JEREMY T. BERGSTROM
Also Admitted in Arizona
GINA M. CORENA
ROCK K. JUNG
KRISTA J. NIELSON
JORY C. GARABEDIAN
THOMAS M. MORLAN
Admitted in California
STEVEN E. STERN
Admitted in Arizona & Illinois
ANDREW H. PASTWICK
Also Admitted in Arizona & California
PATERNO C. JURANI

MILES, BAUER, BERGSTROM & WINTERS, LLP
ATTORNEYS AT LAW SINCE 1985

2200 Paseo Verde Pkwy., Suite 250
Henderson, NV 89052
Phone: (702) 369-5960
Fax: (702) 942-0411

CALIFORNIA OFFICE
1231 E. Dyer Road, Suite 100
Santa Ana, CA 92705
Phone: (714) 481-9100
Fax: (714) 481-9141

RICHARD J. BAUER, JR.
FRED TIMOTHY WINTERS
KEENAN E. McCLENAHAN
MARK T. DOMEYER
Also Admitted in the District of Columbia & Virginia
TAMI S. CROSBY
L. BRYANT JAQUEZ
VY T. PHAM
HADI R. SEYED-ALI
BRIAN H. TRAN
CORI B. JONES
CATHERINE K. MASON
CHRISTINE A. CHUNG
HANH T. NGUYEN
S. SHELLY RAISZADEH
SHANNON C. WILLIAMS
LAWRENCE R. BOIVIN
RICK J. NEHORAOFF
BRIAN M. LUNA
RODRIGO SUAREZ
Also licensed in Texas & El Salvador
KRISTIN C. DERR

April 8, 2013

Estate of Gordon Hansen
Gordon B. Hansen
2664 Olivia Heights Avenue
Henderson, NV 89052-7039

Re: *Property Address: 2763 White Sage Drive, Henderson, NV 89052*
MBBW File No.: 13-H0518

To the Estate of Gordon Hansen:

This letter is written in response to the attached Notice of Default your HOA caused to be issued and recorded by RED ROCK FINANCIAL SERVICES as a result of you allegedly neglecting to timely pay your required HOA assessments on the above described real property. This firm represents the interests of MERS as nominee for Bank of America, N.A., as successor by merger to BAC Home Loans Servicing, LP (hereinafter "BANA") with regard to these issues. As you know, BANA is the beneficiary/servicer of the first deed of trust loan secured by the property.

NRS 116.3116 governs liens against units for assessments. Pursuant to NRS 116.3116:

> The association has a lien on a unit for:
>
> ...
>
> *any penalties, fees, charges, late charges, fines and interest charged pursuant to paragraphs (j) to (n), inclusive, of subsection 1 of NRS 116.3102 are enforceable as assessments under this section*

While the HOA may claim a lien under NRS 116.3102 Subsection (1), Paragraphs (j) through (n) of this Statute clearly provide that such a lien is JUNIOR to first deeds of trust to the extent the lien is for fees and charges imposed for collection and/or attorney fees, collection costs, late fees, service charges and interest. See Subsection 2(b) of NRS 116.3116, which states in pertinent part:

2. A lien under this section is prior to all other liens and encumbrances on a unit except:

(b) A first security interest on the unit recorded before the date on which the assessment sought to be enforced became delinquent...

The lien is also prior to all security interests described in paragraph (b) to the extent of the assessments for common expenses...which would have become due in the absence of acceleration during the 9 months immediately preceding institution of an action to enforce the lien.

Subsection 2b of NRS 116.3116 clearly provides that an HOA lien "is prior to all other liens and encumbrances on a unit except: a first security interest on the unit..." But such a lien is prior to a first security interest to the extent of the assessments for common expenses which would have become due during the 9 months before institution of an action to enforce the lien.

Please be advised that, in the event you do not immediately bring your HOA account current by paying all sums past due, BANA *may* advance the sums necessary to protect *its lien interest* on the property. If BANA does in fact advance said sums, those sums may be added on to the balance you owe on the first position note and deed of trust you executed. BANA may do this per Nevada law and per the express terms of the note and deed of trust you executed. Further, BANA may add the attorney's fees and costs that are being incurred as a result of this matter to your loan. BANA may also do this per Nevada law and per the express terms of the note and deed of trust you executed. **Please note that the HOA foreclosure sale, may still occur despite any advancement of sums made by BANA in order to protect its lien interest on the property, since the amount that my client may advance may not be the same amount that your HOA/RED ROCK FINANCIAL SERVICES is claiming to be due and owing from you. Thus, we strongly advise that you contact your HOA and/or RED ROCK FINANCIAL SERVICES immediately to bring your HOA account current to avoid having your property sold at a potential HOA foreclosure sale by RED ROCK FINANCIAL SERVICES.** If you have already brought your HOA account current with RED ROCK FINANCIAL SERVICES, then please disregard this letter.

Sincerely,

MILES, BAUER, BERGSTROM & WINTERS, LLP

Rock K. Jung, Esq.

Electronically Filed
2/20/2019 8:47 AM
Steven D. Grierson
CLERK OF THE COURT

MELANIE D. MORGAN, ESQ.
Nevada Bar No. 8215
THERA A. COOPER, ESQ.
Nevada Bar No. 13468
AKERMAN LLP
1635 Village Center Circle, Suite 200
Las Vegas, Nevada 89134
Telephone: (702) 634-5000
Facsimile: (702) 380-8572
Email: melanie.morgan@akerman.com
Email: thera.cooper@akerman.com

Attorney for Nationstar Mortgage LLC

DISTRICT COURT

CLARK COUNTY, NEVADA

JOEL STOKES and SANDRA F. STOKES, as trustees of the JIMIJACK IRREVOCABLE TRUST, Plaintiff, vs. BANK OF AMERICA, N.A.; SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC.; DOES I through X and ROE BUSINESS ENTITIES I through X, inclusive, Defendants.	Case No.: A-15-720032-C Consolidated with: A-16-730078-C Dept. No.: XXXI **STIPULATION AND ORDER FOR DISMISSAL WITHOUT PREJUDICE AS TO CLAIMS AGAINST OPPORTUNITY HOMES, LLC AND F. BONDURANT, LLC**
NATIONSTAR MORTGAGE, LLC Counter-Claimant, vs. JIMIJACK IRREVOCABLE TRUST; OPPORTUNITY HOMES, LLC, a Nevada limited liability company; F. BONDURANT, LLC, a Nevada limited liability company; DOES I through X, inclusive; and ROE CORPORATIONS XI through XX, inclusive, Counter-Defendants.	

AKERMAN LLP
1635 VILLAGE CENTER CIRCLE, SUITE 200
LAS VEGAS, NEVADA 89134
TEL.: (702) 634-5000 – FAX: (702) 380-8572

FEB 14 19 PM05:21*

NONA TOBIN, an individual, and Trustee of the GORDON B. HANSEN TRUST. Dated 8/22/08
Counter-Claimant,

vs.

JOEL A. STOKES and SANDRA F. STOKES, as trustees of the JIMIJACK IRREVOCABLE TRUST,

Counter-Defendants.

NONA TOBIN, an individual, and Trustee of the GORDON B. HANSEN TRUST. Dated 8/22/08
Cross-Claimant,

vs.

SUN CITY ANTHEM COMMUNITY ASSOCIATION, INC., DOES 1-10, AND ROE CORPORATIONS 1-10, inclusive,

Counter-Defendants.

NONA TOBIN, an individual, and Trustee of the GORDON B. HANSEN TRUST. Dated 8/22/08
Cross-Claimant,

vs.

OPPORTUNITY HOMES, LLC, THOMAS LUCAS, Manager,

Counter-Defendant.

NONA TOBIN, an individual, and Trustee of the GORDON B. HANSEN TRUST. Dated 8/22/08
Cross-Claimant,

vs.

YUEN K. LEE, an Individual, d/b/a Manager, F. BONDURANT, LLC,

Counter-Defendant.

AKERMAN LLP
1635 VILLAGE CENTER CIRCLE, SUITE 200
LAS VEGAS, NEVADA 89134
TEL.: (702) 634-5000 – FAX: (702) 380-8572

Defendant In Intervention/Counterclaimant, Nationstar Mortgage LLC (**Nationstar**), Counter-Defendant Opportunity Homes, LLC (**Opportunity Homes**) and Counter-Defendant F. Bondurant, LLC (**F. Bondurant**), by and through their counsel of record, stipulate to the dismissal of Nationstar's claims against Opportunity Homes and F. Bondurant without prejudice, pursuant to NRCP 41(a)(1).

Each party shall bear their own fees and costs.

Dated this 6 day of February, 2019. **AKERMAN LLP** MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 THERA A. COOPER, ESQ. Nevada Bar No. 13468 1635 Village Center Circle, Suite 200 Las Vegas, Nevada 89134 *Attorneys for Nationstar Mortgage LLC*	Dated this ___ day of February, 2019. **THE MEDRALA LAW FIRM, LLC** JAKUB P. MEDRALA, ESQ. Nevada Bar No. 12822 1091 South Cimarron Road, Suite A-1 Las Vegas, Nevada 89145 *Attorney for Opportunity Homes, LLC*
Dated this ___ day of February, 2019. **HONG & HONG, APLC** JOSEPH Y. HONG, ESQ. Nevada Bar No. 5995 1980 Festival Drive, Suite 650 Las Vegas, Nevada 89135 *Attorney for F. Bondurant, LLC*	

AKERMAN LLP
1635 VILLAGE CENTER CIRCLE, SUITE 200
LAS VEGAS, NEVADA 89134
TEL.: (702) 634-5000 – FAX: (702) 380-8572

Defendant In Intervention/Counterclaimant, Nationstar Mortgage LLC (**Nationstar**), Counter-Defendant Opportunity Homes, LLC (**Opportunity Homes**) and Counter-Defendant F. Bondurant, LLC (**F. Bondurant**), by and through their counsel of record, stipulate to the dismissal of Nationstar's claims against Opportunity Homes and F. Bondurant without prejudice, pursuant to NRCP 41(a)(1).

Each party shall bear their own fees and costs.

Dated this 6 day of February, 2019. **AKERMAN LLP** MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 THERA A. COOPER, ESQ. Nevada Bar No. 13468 1635 Village Center Circle, Suite 200 Las Vegas, Nevada 89134 *Attorneys for Nationstar Mortgage LLC*	Dated this ___ day of February, 2019. **THE MEDRALA LAW FIRM, LLC** JAKUB P. MEDRALA, ESQ. Nevada Bar No. 12822 1091 South Cimarron Road, Suite A-1 Las Vegas, Nevada 89145 *Attorney for Opportunity Homes, LLC*
Dated this 7 day of February, 2019. **HONG & HONG, APLC** JOSEPH Y. HONG, ESQ. Nevada Bar No. 5995 1980 Festival Drive, Suite 650 Las Vegas, Nevada 89135 *Attorney for F. Bondurant, LLC*	

AKERMAN LLP
1635 VILLAGE CENTER CIRCLE, SUITE 200
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TEL.: (702) 634-5000 – FAX: (702) 380-8572

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Each party shall bear their own fees and costs.

Dated this ___ day of February, 2019. **AKERMAN LLP** MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 THERA A. COOPER, ESQ. Nevada Bar No. 13468 1635 Village Center Circle, Suite 200 Las Vegas, Nevada 89134 *Attorneys for Nationstar Mortgage LLC*	Dated this 8th day of February, 2019. **THE MEDRALA LAW FIRM, LLC** JAKUB P. MEDRALA, ESQ. Nevada Bar No. 12822 1091 South Cimarron Road, Suite A-1 Las Vegas, Nevada 89145 *Attorney for Opportunity Homes, LLC*
Dated this ___ day of February, 2019. **HONG & HONG, APLC** JOSEPH Y. HONG, ESQ. Nevada Bar No. 5995 1980 Festival Drive, Suite 650 Las Vegas, Nevada 89135 *Attorney for F. Bondurant, LLC*	

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LAS VEGAS, NEVADA 89134
TEL.: (702) 634-5000 – FAX: (702) 380-8572

ORDER

IT IS HEREBY ORDERED, ADJUDGED AND DECREED all claims asserted by Nationstar against Opportunity Homes and F. Bondurant are dismissed without prejudice, with each party to bear their own attorneys' fees and costs.

DATED: February 14, 2019

JOANNA S. KISHNER

DISTRICT COURT JUDGE

Respectfully submitted by:

AKERMAN LLP

MELANIE D. MORGAN, ESQ.
Nevada Bar No. 8215
THERA A. COOPER, ESQ.
Nevada Bar No. 13468
1635 Village Center Circle, Suite 200
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