

RECEIVED

2024 MAR -6 PM 3:02

BEFORE THE CITY COUNCIL  
OF THE CITY OF LAS VEGAS, NEVADA

\* \* \*

IN THE MATTER OF:

DEPARTMENT OF COMMUNITY  
DEVELOPMENT on behalf of the CITY OF  
LAS VEGAS, NEVADA,

Petitioner,

vs.

KNK PROPERTY MANAGEMENT, LLC  
d/b/a TRAVELERS BED AND  
BREAKFAST; and HOPE KWON,  
Managing Member,

Respondents.

**ORDER APPROVING  
COMPLAINT AND NOTICE OF HEARING**

TO: KNK PROPERTY MANAGEMENT, LLC d/b/a TRAVELERS BED AND  
BREAKFAST; and HOPE KWON, Managing Member, Respondents:

The Complaint for Disciplinary Action by the DEPARTMENT OF COMMUNITY  
DEVELOPMENT on behalf of the CITY OF LAS VEGAS, NEVADA, against you dated  
February 26, 2024, a copy of which is attached to this Order and Notice, having come before the  
City Council of the City of Las Vegas, Nevada, at its regular meeting held on March 6, 2024, and  
the Council being satisfied that probable grounds exist for disciplinary action against you as  
alleged in the Complaint for Disciplinary Action;

IT IS ORDERED that the issuance of the Complaint for Disciplinary Action and a  
hearing on the Complaint for Disciplinary Action are approved.

....

1 YOU ARE HEREBY NOTIFIED that the hearing will be held before the City Council of  
2 the City of Las Vegas, Nevada, at the Council Chambers, City Hall, 495 South Main Street, Las  
3 Vegas, Nevada, 89101, on March 20, 2024, beginning at the hour of 9 a.m., or as soon thereafter  
4 as the matter can be heard.

5 The hearing will be upon the charges in the Complaint for Disciplinary Action which has  
6 been served upon you. You may be present at the hearing and you may be represented by a  
7 lawyer. You may present any relevant evidence you have, and you will be given full opportunity  
8 to cross examine all witnesses testifying against you.

9 YOU ARE FURTHER NOTIFIED that within twenty (20) days after service of the  
10 Complaint for Disciplinary Action, but not later than five (5) days before the hearing date, you  
11 must file with the City Clerk, Second Floor, City Hall, 495 South Main Street, Las Vegas,  
12 Nevada, 89101, and serve a copy upon the City Attorney of your answer to the charges made in  
13 the Complaint for Disciplinary Action, and set forth any affirmative defenses you intend to raise.

14 YOU ARE ALSO NOTIFIED that your failure to file an answer to the Complaint for  
15 Disciplinary Action or to appear at the hearing shall constitute an admission to all the matters  
16 contained in the Complaint for Disciplinary Action as provided by Las Vegas Municipal Code §  
17 6.88.100.

18 DATED this 6th day of March, 2024.

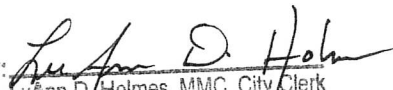
19 THE CITY COUNCIL OF THE  
20 CITY OF LAS VEGAS, NEVADA

21 By:

22   
23 CAROLYN G. GOODMAN  
24 Mayor

25 APPROVED AS TO LEGAL FORM:

26   
27 JOHN A CURTAS  
28 Deputy City Attorney

Attest By:   
LuAnn D. Holmes, MMC, City Clerk

3-6-24  
Date

RECEIVED

2024 MAR -3 2:11:12

BEFORE THE CITY COUNCIL  
OF THE CITY OF LAS VEGAS, NEVADA

\* \* \*

IN THE MATTER OF:

DEPARTMENT OF COMMUNITY  
DEVELOPMENT on behalf of the CITY OF  
LAS VEGAS, NEVADA,

Petitioner,

vs.

KNK PROPERTY MANAGEMENT, LLC  
d/b/a TRAVELERS BED AND  
BREAKFAST; and HOPE KWON,  
Managing Member,

Respondents.

**COMPLAINT FOR DISCIPLINARY ACTION**

The DEPARTMENT OF COMMUNITY DEVELOPMENT, on behalf of the CITY OF LAS VEGAS, NEVADA ("Department"), Petitioner, brings this Complaint for Disciplinary Action against KNK PROPERTY MANAGEMENT, LLC d/b/a TRAVELERS BED AND BREAKFAST, HOPE KWON, Managing Member, whose place of business is located at 1502 South Las Vegas Boulevard, Las Vegas, NV 89101, Respondents, and states:

Respondents KNK PROPERTY MANAGEMENT, LLC d/b/a TRAVELERS BED AND BREAKFAST, and HOPE KWON, Managing Member, hold Business License Nos. G63-05293 (Hotel) and G63-05479 (Residence Hostel Single Room).

**SUMMARY OF ALLEGATIONS**

1. This is a complaint under Las Vegas Municipal Code (LVMC) 6.88.020 following an investigation by the Business Licensing Division into potential violations of LVMC

....

1 Title 6 by KNK PROPERTY MANAGEMENT, LLC d/b/a TRAVELERS BED AND  
2 BREAKFAST, and HOPE KWON.

3 2. KNK PROPERTY MANAGEMENT, LLC d/b/a TRAVELERS BED AND  
4 BREAKFAST, and HOPE KWON, Managing Member, are licensed to operate a hotel in the  
5 City of Las Vegas at 1502 Las Vegas Boulevard South, Las Vegas, NV 89104, under Business  
6 License Nos. G63-05293 (Hotel) and G63-05479 (Residence Hostel Single Room). The City of  
7 Las Vegas is seeking a permanent revocation of these licenses due to the continued operation of  
8 the premises as a public nuisance in violation of LVMC 6.02.330, and LVMC 6.06.250.

9 **STATEMENT OF FACTS**

10 3. Travelers Bed and Breakfast is owned and operated by KNK Property  
11 Management, LLC – Hope Kwon, Managing Member, 100%, under business license numbers  
12 G63-05293 (Hotel) and G63-05479 (Residence Hostel Single Room) located at 1502 South Las  
13 Vegas Boulevard, Las Vegas, Nevada 89104 (Ward 3 - Diaz).

14 4. Las Vegas Metropolitan Police Department (LVMPD) has issued this business  
15 several Chronic Nuisance Letters dated March 15, 2023, April 5, 2023, and more recently,  
16 February 11, 2024, which identified criminal activity including violent crimes associated with  
17 the property.

18 5. After review of the Business License Compliance Summary Report, the Director  
19 is satisfied that evidence of multiple violations of Title 6 and 19 LVMC have been demonstrated.

20 6. **July 29, 2015**--An application was approved for a business license for a Hotel  
21 containing four (4) rooms and business license for a Hostel containing twenty-two (22) rooms.  
22 The application description indicated, "Public Accommodations/Room Renting Business. Hotel  
23 will only rent rooms A, B, E, and D (4 rooms). Hostel. Daily Rental only." A condition from the  
24 Planning approval stipulated on the Hostel application "Hotel is permissible in C-2 zone. 'Daily'  
25 rental period is not allowed for more than 1 week."

26 7. **November 9, 2021**--The department received a citizen complaint of criminal  
27 activity at the premises (drugs, prostitution, robbery with a firearm and a stabbing), concerns that  
28 the fire alarms would go off daily, and an unlicensed hair salon inside of room D.



1           8.       **April 5, 2023**--A Notice and Declaration of Chronic Nuisance letter was served to  
2 Kwon Hope from LVMPD. This notice identified five activities that they constituted as a chronic  
3 nuisance from the property of 1502 South Las Vegas Boulevard dating from February 25, 2023  
4 through March 31, 2023. *See Exhibit A.*

5           9.       **June 6, 2023**--A complaint was received from LVMPD for ongoing criminal  
6 activity at the Travelers Bed and Breakfast. They added to their April 5, 2023 Chronic Nuisance  
7 letter another incident dated June 3, 2023.

8           10.      **June 13, 2023**--A business licensing compliance inspection was conducted, upon  
9 arrival staff found the office was closed with no staff on site. Hope Kwon was called and  
10 informed that a compliance inspection was being conducted to follow-up on a complaint  
11 received from LVMPD. Ms. Kwon confirmed there was criminal activity onsite but none of it  
12 has been her or her staff's fault.

13          11.      City staff explained that they were not there to determine fault or have input on  
14 any criminal investigation occurring, that they were there to check that the business was in  
15 compliance with business licensing requirements. A few minutes later, the manager, identified as  
16 Lidia Varquez-Casanova, came to the office and explained that she was out walking the property.  
17 Noncompliance was found and a correction notice was issued for failure to maintain adequate  
18 room records, including the required journal in violation of LVMC 6.46.100. A paper  
19 registration card was available, but receipts did not include the full name or a breakdown of the  
20 stay details (price, room rate, and room tax) and fees breakdown as required by code. The public  
21 register was not available and is a violation of LVMC 6.46 .150. Education was provided and a  
22 follow up inspection scheduled for June 20, 2023. *See Exhibit B.*

23          12.      **November 15, 2023**--A joint inspection was conducted by business licensing  
24 compliance staff, LVMPD Downtown Area Command, and Fire Prevention Inspectors. City staff  
25 spoke with Young Ha Kim, who was the acting manager for the day. Hope Kwon was said to be  
26 in Korea until November 20, 2023. The acting manager was not able to produce the requested  
27 room records. The records that were available on the counter were incomplete and the entries  
28 ceased in August 2023, the rental receipt book was incorrectly filled out for November 2023.

1 The receipts were once again completed as a flat fee and not with the code-required breakdown  
2 of rental fees and room taxes. A second correction notice with a \$99.99 re-inspection fee was  
3 assessed for violations of LVMC 6.46.100 and 6.46.150. *See Exhibit C.*

4 13. **February 13, 2024**--Business licensing compliance staff conducted an inspection.  
5 Upon arrival, and while waiting for other city staff to arrive they parked across the street on Utah  
6 and observed several people leave the Travelers property through the side gate on Utah and walk  
7 to the alley behind the Travelers property where they were loitering. They observed one male  
8 who exited the property take off his pants in the alley.

9 14. City staff walked to the locked front entrance passing several people who  
10 appeared to be unhoused and loitering in front of the entrance. Upon entering the building they  
11 entered and walked upstairs to the office where Lidia Varquez-Casanova was waiting. Staff  
12 advised her that they were onsite for a follow-up inspection. Ms. Varquez-Casanova provided a  
13 copy of the blank guest registration form and explained that the verbiage on the form recently  
14 changed to include "the maximum stay is twenty-eight (28) days" with "return to property is a  
15 minimum two (2) or four (4) days." Staff asked Mr. Varquez-Casanova to explain and she stated  
16 they have one guest, named Hector Zepeda, who has stayed at the property for three (3) years,  
17 but is a "good guest."

18 15. She then explained they have had several other guests who required evictions  
19 from the constable's office. The most recent guest, being Amanda Williams, who checked into  
20 Travelers in November 2023, and stopped paying in December 2023. Ms. Varquez-Casanova  
21 then showed city staff a log containing names, room numbers, arrival date, departure date, and  
22 payment information. The information did not correlate with the verbal information she gave on  
23 Ms. Williams as one line indicated: Amanda Williams arrival date of 12/28/2023 and departure  
24 date 02/13/2024 with a balance due of \$4,227. Ms. Varquez-Casanova stated Ms. Williams had  
25 not departed yet and was pending eviction although the record stated a departure date.

26 16. City staff explained to her that the business licenses do not allow for extended  
27 stay and that the eviction process would not be needed if the business were operating with the  
28 licensing guidelines by not allowing guests to stay longer than 30 days. City staff explained that

1 the licenses only allow for short-term rental and that city staff cannot direct LVMPD officers to  
2 evict for the property. A third correction notice with a \$132 re-inspection fee was issued for  
3 allowing extended stay activity without a valid business license under LVMC 6.02.370(A)(1),  
4 for failure to maintain adequate room records under LVMC 6.46.100, and for failure to provide,  
5 keep, and maintain an adequate public register under LVMC 6.46 .150. *See* Exhibit D.

6 17. **February 21, 2024**--A joint inspection was conducted by Business Licensing  
7 staff, Downtown Area Command officers, Fire Prevention inspectors, Building & Safety  
8 inspectors, Code Enforcement officers. Hope Kwon was on the premises during this inspection.  
9 Business licensing staff checked the business registration records which were found to be out of  
10 compliance again. Ms. Kwon was educated again on the code requirements regarding the  
11 register and records.

12 18. Ms. Kwon confirmed she has long-term residents on the premises. At least three  
13 (3) of the tenants in the bungalows have been there for an extended time (3 months to 3 years).  
14 She was reminded that her licenses do not allow for extended stay and only allows for daily and  
15 less than weekly rentals. Ms. Kwon was provided information on how to apply for a special use  
16 permit and business license for extended stays. A fourth notice of violation was issued for a \$500  
17 civil fine and \$132 re-inspection fee for failure to maintain or provide adequate room records and  
18 public register. Code Enforcement staff stated there were repairs that needed to be completed and  
19 provided Ms. Kwon with a re-inspection date of March 4, 2024. *See* Exhibit E.

#### 20 **LAS VEGAS METROPOLITAN POLICE DEPARTMENT REPORTS**

21 19. **February 16, 2024**--LVMPD Downtown Area Command, Community Policing  
22 Division issued a Notice and Declaration of Chronic Nuisance for the following activities:

23 (a) On February 11, 2024, a subject was stabbed in the abdomen multiple times  
24 during a fight that ensued in front of the Travelers. The subject was located upstairs bleeding  
25 profusely. It is believed that event occurred over a narcotics dispute. Video evidence showed  
26 multiple narcotics transactions occurred on the property prior the stabbing. LVMPD Event#  
27 LLV240200039018.

28 . . . .

1 (b) On January 24, 2024, a subject was stabbed in front of 1502 South Las Vegas  
2 Boulevard. During the investigation, the owner indicated the business had a good security  
3 camera system; however, purported security guard, who is a resident of the property, informed  
4 the detective that the video system was not operable during the stabbing incident. The event is  
5 believed to be connected to a resident of the property. LVMPD Event #LL V24010082401.

6 (c) January 2024 - Present, multiple narcotics overdose event at or near the Travelers.

7 20. The property was previously issued a Notice and Declaration of Chronic Nuisance  
8 letters on March 15, 2023, and April 5, 2023. The property owner failed to contact LVMPD  
9 Downtown Area Command regarding either of the previously issued notices of chronic nuisance.  
10 The property owner also refused to communicate with Downtown Area Command regarding the  
11 ongoing criminal activity at the property when they attempted to reach out to the property owner.

12 21. Following the issuance of the April 5, 2023, Notice and Declaration of Chronic  
13 Nuisance, criminal activity including violent crimes and narcotics activity has continued  
14 associated with the property. A homicide occurred on October 10, 2023, linked to a room break  
15 in at the property. LVMPD Event# 231000075464. Search warrants connected to investigations  
16 of narcotics activity occurring at the property were executed in June 2023 (LVMPD Event#  
17 LLV230600020214), October 2023 (LVMPD Event#LLV231000091357), and December 2023  
18 (LVMPD Event# LLV23120074793). During execution of the search warrant in December 2023  
19 at the property, a security guard affirmatively attempted to stop/delay officers from effecting the  
20 judicially authorized search. *See Exhibit F.*

### 21 SUBSTANTIVE LAW

22 22. Under LVMC 6.02.330, a licensee may be subject to disciplinary action by City  
23 Council for good cause, which may include the following:

24 (A) The licensee or any of its principals is engaged, or has  
25 commenced, instituted, advertised, aided, carried on, continued or  
26 engaged, in a business, trade or profession without having obtained  
27 a valid license, an approval for suitability, a permit or a work card  
28 when such person knew that one was required or under such  
circumstances that such person reasonably should have known one  
was required, or has solicited, encouraged, caused or procured  
another to do so;

.....  
(E) The licensee or any of its principals has perpetrated, or has solicited, encouraged, caused or procured another to perpetrate, a deceptive practice upon the public;

.....  
(G) The premises on which the business is conducted do not satisfy local, State or Federal law or regulations which pertain to the activity which is actually engaged in;

(H) The business activity constitutes, promotes, causes, allows, fosters, aids, or otherwise enables a private nuisance, public nuisance or chronic nuisance, or has been or is being conducted in an unlawful, illegal or impermissible manner, including but not limited to causing, allowing, promoting, fostering, aiding, enabling, exercising deliberate ignorance towards or failing to abate a private nuisance, public nuisance or chronic nuisance;

(I) Substantial information exists which tends to show that the licensee or any of its principals is dishonest or corrupt;

(J) The licensee, any of its principals, their employees or those acting on their behalf failed to cooperate with the Director's efforts to enforce the provisions of this Code.

23. Respondents KNK PROPERTY MANAGEMENT, LLC d/b/a TRAVELERS BED AND BREAKFAST, and HOPE KWON, should be subject to disciplinary action by the City Council under LVMC 6.06.250, which provides:

(A) A licensee may be subject to disciplinary action as set forth in Sections 6.02.330 through 6.02.360.

(B) A principal approved for suitability may be subject to disciplinary action by the City Council for good cause, which may include, but is not limited to:

(1) The application is incomplete or contains false, misleading or fraudulent statements with respect to any information required in the application;

(2) The principal fails to satisfy any qualification or requirement imposed by this Code, or other local, State or Federal law or regulation pertaining to the particular approval for suitability sought or held;

(3) The principal illegally resides in the United States;

(4) The principal is or has engaged in a business, trade or profession without a valid license, permit, approval for suitability or work card when he knew that one was required or under such

1 circumstances that he reasonably should have known one was  
2 required;

3 (5) The principal has been subject, in any jurisdiction, to  
4 disciplinary action of any kind against a license, permit, approval  
5 for suitability or work card to the extent that such disciplinary  
6 action reflects on the qualification, acceptability or fitness to be  
7 approved for suitability;

8 (6) The principal has committed acts which would  
9 constitute a crime involving moral turpitude or involving any  
10 Federal, State or local law or regulation relating to the same or a  
11 similar business. For purposes of this Paragraph, a crime involving  
12 moral turpitude is one that necessarily involves any of the  
13 following: an intent to defraud; intentional dishonesty for personal  
14 gain; intentional causing of serious injury to another person; the  
15 sale of narcotics or possession of narcotics with intent to sell; or a  
16 sexual offense as described in NRS 179D.097;

17 (7) When substantial information exists which tends to  
18 show that the principal is dishonest or corrupt;

19 (8) The principal lacks sufficient financial, technical or  
20 educational ability or experience to conduct or perform the activity  
21 for which approval for suitability is sought;

22 (9) The principal, or his or her employees or those acting  
23 on their behalf, violates any condition upon which approval for  
24 suitability was granted;

25 (10) The principal has engaged in deceptive practices upon  
26 the public; or

27 (11) The principal suffers from a legal disability under the  
28 laws of the State.

24. Respondents KNK PROPERTY MANAGEMENT, LLC d/b/a TRAVELERS  
BED AND BREAKFAST, and HOPE KWON, should be subject to disciplinary action by City  
Council under LVMC 6.02.330(A), (E), (G), (H), (I) and (J). Based on the facts already  
substantiated and the seriousness of the City's LVMC violations, the Business Licensing  
Division requests disciplinary action by City Council against the KNK PROPERTY  
MANAGEMENT, LLC d/b/a TRAVELERS BED AND BREAKFAST, and HOPE KWON in  
the form of the permanent revocation of the business licenses.

25. Based on the facts already substantiated and the seriousness of the City code  
violations, the Business Licensing Division of the Department of Community Development  
requests disciplinary action by the City Council against KNK PROPERTY MANAGEMENT,

1 LLC d/b/a TRAVELERS BED AND BREAKFAST, and HOPE KWON in the form of  
2 revocation of their business licenses.

3 **STANDARD OF EVIDENCE**

4 26. LVMC 6.88.090 provides:

5 (A) The hearing need not be conducted according to  
6 technical rules relating to evidence and witnesses. Any relevant  
evidence may be admitted.

7 (B) The respondent shall have the right to call and examine  
8 witnesses on his own behalf, cross examine opposing witnesses,  
9 introduce exhibits and evidence relevant to the issues of the case,  
and offer rebuttal evidence.

10 (C) The respondent may be called and examined by the  
City.

11 (D) The Clerk shall have the power to issue subpoenas for  
12 witnesses to appear to give testimony.

13 **PENALTY**

14 27. LVMC 6.02.360 provides:

15 Upon a showing of good cause and in the discretion of the  
16 City Council, disciplinary action against a holder may take the  
17 form of cancellation, revocation, refusal to renew, suspension,  
18 imposition of conditions or restrictions or civil fine in an amount  
19 not to exceed one thousand dollars for each day that the violation  
20 which forms the subject matter of the complaint that recommends  
21 such disciplinary action is demonstrated to have been in existence,  
22 or any combination of such actions, as the particular situation may  
require. The Council may also impose against the licensee the  
actual costs incurred, and a reasonable amount for attorney's fees,  
resulting from the imposition of disciplinary action. The  
disciplinary actions available in this Section shall be in addition to,  
and not exclusive of, any other civil or criminal remedy which  
otherwise might be available

23 WHEREFORE, the Petitioner respectfully requests the City Council to:

24 A. Approve the Complaint for Disciplinary Action and order a disciplinary hearing at  
25 which the Respondents shall appear and show cause why the licenses that are the subject of this  
26 Complaint should not be suspended or revoked, or other disciplinary action taken; or

27 . . . .

28 . . . .

1 B. Grant such other and further relief as the Council deems appropriate.

2 DATED this 26<sup>th</sup> day of February, 2024.

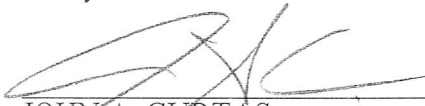
3 RESPECTFULLY SUBMITTED:

4  
5 By:

  
STEVEN FORD, Deputy City Manager

6  
7 JEFFRY M. DOROCAK  
City Attorney

8  
9 By:

  
JOHN A. CURTAS  
Deputy City Attorney  
Nevada Bar No. 1841  
495 South Main Street, Sixth Floor  
Las Vegas, NV 89101  
Attorneys for CITY OF LAS VEGAS



**EXHIBIT A**

**EXHIBIT A**

\*\*\*\*NOTICE AND DECLARATION OF CHRONIC NUISANCE\*\*\*\*

Via Certified Mail, Return Receipt Requested

04/05/2023

Chronic Nuisance Location: 1502 S Las Vegas Blvd  
Las Vegas, NV 89104

Parcel Number: 16203210064

Owner's Name and Address: Qwon Hope  
1502 S Las Vegas Blvd  
Las Vegas, NV 89104

WHY ARE YOU RECEIVING THIS NOTICE?

Pursuant to Las Vegas Municipal Code ("LVMC") § 9.04.110, you are hereby notified as owner(s) of the property located at and commonly known as 1502 S Las Vegas Blvd, Las Vegas, NV 89104 APN# (hereinafter "Property"), that the Las Vegas Metropolitan Police Department ("LVMPD") declares the existence of a chronic nuisance at the Property.

WHAT IS A CHRONIC NUISANCE?

Pursuant to LVMC § 9.04.010, "**chronic nuisance**" means the existence of any of the following conditions [with emphasis added]:

- (1) When three or more nuisance activities exist or have occurred during any thirty-day period on a property;
- (2) When a person associated with the property has engaged in three or more nuisance activities during any thirty-day period on the property or within one hundred feet of the property;
- (3) When the property has been the subject of a search warrant based on probable cause of continuous or repeated violations of NRS Chapter 459;

- (4) When a building or place is used for the purpose of unlawfully selling, serving, storing, keeping, manufacturing, using or giving away a controlled substance, immediate precursor as defined in NRS 453.086 or controlled substance analog as defined in NRS 453.043; or
- (5) When a building or place was used for the purpose of unlawfully manufacturing a controlled substance, immediate precursor or controlled substance analog and:
  - (a) The building or place has not been deemed safe for habitation by a governmental entity; or
  - (b) All materials or substances involving the controlled substance, immediate precursor or controlled substance analog have not been removed from or remediated on the building or place by an entity certified or licensed to do so within one hundred eighty days after the building or place is no longer used for the purpose of unlawfully manufacturing a controlled substance, immediate precursor or controlled substance analog.

For purposes of the above, and pursuant to LVMC § 9.04.010, “nuisance activity” means any of the following conditions:

- (1) Any area, structure or object which by its nature, location, or character would tend to attract and endanger the safety of any minor person.
- (2) Any violation of Title 16, including violations of the codes pertaining to building, construction, housing, and fire safety adopted thereunder.
- (3) Any body of water which by its nature or location constitutes an unhealthy or unsafe condition, including any accumulation of stagnant water...
- (4) Any refuse, waste, litter or other material, regardless of its market value, which, by reason of its location or character, is unsightly or interferes with the reasonable use and enjoyment of adjacent properties, has a detrimental effect upon adjacent property values, or would hamper or interfere with the containment of fire upon the premises...
- (5) Any violation of Title 19 [Zoning] or Title 20 [Flood Control] of this Code.
- (6) Operating a business without a current license as required by Title 6.
- (7) An odor nuisance as described in LVMC Chapter 9.40.
- (8) A chronically-blighted property.
- (9) Any other act or condition, other than those permitted by NRS 40.140 and 202.450, which, by reason of its nature, character or location, interferes with the reasonable use and enjoyment of adjacent properties, or which has a detrimental effect upon adjacent property values. Such nuisances include without limitation the following:
  - (a) Weeds...;
  - (b) Dead trees, plants and other vegetation...;
  - (c) Graffiti, as defined in LVMC 10.48.060, that is allowed to remain for more than twenty-four hours;
  - (d) Unpainted or painted buildings, walls, fences or other structures whose condition has become so deteriorated as to create a hazardous condition; ...or create a condition of blight visible from public right-of-way;

- (e) Any vehicle that has been abandoned, or any vehicle in an obviously mechanically inoperable condition...
- (f) Criminal activity on any lot or premises within the City.

**WHAT DID LVMPD IDENTIFY FROM YOUR PROPERTY THAT CONSTITUTES THE CHRONIC NUISANCE?**

LVMPD has identified the following conditions which constitute nuisance activities:

	Date	Description	Event #
1	02/25/2023	-Domestic Disturbance-Under this event, a domestic violence incident occurred between two guests with one of the persons claiming they were strangled. It was also reported that one of the persons destroyed property inside room at the property	LLV230200102426
2	03/02/2023	-Dead Body-Under this event, a tenant/guest was found unresponsive at 1502 S Las Vegas Blvd due to a possible drug overdose	LLV230300008898
3	03/10/2023	-Robbery-Under this event, victim was battered and then robbed, and victim's car was stolen at the property.	LLV230300040717
4	03/14/2023	-Person with a Gun-Under this event, a person reporting stated that an unknown subject had brandished a firearm at him.	LLV230300058025
5	03/31/2023	-Person Armed with Other Deadly Weapon-Under this event, a tenant of the property brandished an electronic control device (TASER) at an employee during a verbal altercation.	LLV230300135439
	06/03/2023	-Assault/Battery with Firearm- Victim was shot at the location reference an altercation with another male. Subject sustained a gunshot wound to the buttocks and the investigation is ongoing.	LLV230600013371

**WHAT DO YOU NEED TO DO NEXT?**

The above conditions need to be abated by **May 5<sup>th</sup> 2023 (30 days from now)** in order to prevent the matter from being submitted to the Las Vegas City Attorney for legal action. This means you will desist, remedy, and prevent persons on the Property from continuing or undertaking the nuisance activities described above.

You are requested to contact LVMPD Downtown Area Command Community Oriented Policing Office at 702-828-3844 Monday thru Thursday between 8 a.m. and 3 p.m. or come in person to

Downtown Area Command at 621 N 9<sup>th</sup> Street, Las Vegas, NV 89104, Monday thru Thursday between 8 a.m. and 3p.m to discuss recommended means by which to abate. These include:

- The completion of the Crime-Free Multi-Housing Program ("CFMHP) through LVMPD and the implementation of CFMHP policies governing lighting, door locks, window locks, security cameras, and signage;
- The use of the CFMHP's crime-free lease addendum, which gives the owner the right to evict tenants who commit crimes on the Property;
- The implementation of a policy requiring guests to present picture identification prior to renting space and to register their vehicles at check-in;
- The use of publicdata.com, or some similar website, to check the backgrounds of all prospective tenants;
- The implementation of a policy preventing the lease of space to convicted felons;
- The implementation of a policy requiring the owner to keep records of all background checks;
- The implementation of policies governing visiting hours, trespassers, and evictions;
- The trespassing and eviction of any visitors at the Property after visiting hours;
- The implementation of a policy preventing any lease less than one-month in length;
- The participation in the Identify, Detect, and Locate program, which requires the owner to forward information about tenants to LVMPD for the purpose of locating wanted criminals;
- Other security measures. Secure outside gates and doors, security presence, implement better lighting at nighttime.

**CAN YOU OBJECT TO THIS NOTICE AND DECLARATION OF CHRONIC NUISANCE?**

**Yes. You have the opportunity for a hearing before a court of competent jurisdiction.**

**WHAT WILL HAPPEN IF YOU FAIL TO TAKE STEPS TO ABATE THE CHRONIC NUISANCE?**

LVMPD and the Community Oriented Policing Division are committed to working closely and aggressively with the City of Las Vegas to identify and correct problems in this community that lead to crime. We are also committed to assisting homeowners, business owners, and citizens of Las Vegas to achieve a higher quality of living. We strive to make Las Vegas the "Safest City in America." Therefore, we are committed to helping you through this process and will commit whatever resources necessary to help you create a safe environment.

With that said, failure to abate the Chronic Nuisance by April 15th, 2023 (30 days from now) , may result in LVMPD requesting the Las Vegas City Attorney to file an abatement action against you pursuant to LVMC § 9.04.120. This may result in the closure of the Property, the abatement of the Property in some other way, and/or the imposition of fines and/or abatement costs.

Sincerely,

Officer L Belisle, P#16627  
Downtown Area Command  
Community Policing Division  
702-828-3844  
LVMPD Downtown Area Command C.O.P. Officer

cc: S. Scott Greenberg, Esq., Assistant General Counsel, LVMPD  
David Bailey, Esq., Deputy City Attorney, City of Las Vegas  
debailey@lasvegasnevada.gov

**EXHIBIT B**

**EXHIBIT B**

# NOTICE – HOTEL & MOTEL

☐ COURTESY NOTICE ☒ **CORRECTION NOTICE** ☐ NOTICE OF VIOLATION

City of Las Vegas Department of Community  
Business Licensing Division – Compliance Section

BLE 975677

DBA: TRAVELERS BED & BREAKFAST License Number(s): G63-05293, G63-05479 ☐ UNLICENSED

Location: 1502 S LAS VEGAS BLVD Suite Las Vegas, NV, 89104 Inspection Number:

Inspection Date: 6-13-2023 Time: 1345 Issue Date: 6-13-2023 Time: 1400 Multiple Violation Dates: ☐ Yes ☒ No

Mailing Address: 1502 S LAS VEGAS BLVD LAS VEGAS NV 89104 E-Mail: TRAVELERSBEDANDBREAKFAST@GMAIL.COM

NV Business Registration/Entity: NV20131506825 / KNK PROPERTY MANAGEMENT LLC ☒ Active ☐ Expired ☐ Revoked ☐ Default ☐ None

Responsible Parties: ☐ Owner ☐ Key-Employee ☐ Employee ☐ Sole Proprietor ☒ LLC ☐ Corporation ☐ Other:

Name: HOPE KWON DOB: ID #: ID Type:

Name: DOB: ID #: ID Type:

**Las Vegas Municipal Code Reference:**

- ☐ 6.02.060(A)(1) Conducting unlicensed business activity
- ☐ 6.02.060(A)(2) Allow/permit another to conduct unlicensed business activity
- ☐ 6.02.060(A)(3) Conducting unlicensed business activity for another
- ☐ 6.02.125 Failure to acquire health card and/or health permit from SNHD
- ☐ 6.02.250(B) Failure to pay delinquent business license fees
- ☐ 6.02.270 Failure to prominently display business license
- ☐ 6.02.290 Failure to report a change of ownership
- ☐ 6.02.310 Failure to report a change of business name
- ☐ 6.02.320(A) Failure to report changes – general license
- ☐ 6.02.370(A)(1) Separate license (s) required for business activity
- ☐ 6.02.370(A)(3) No valid State Business Registration NRS 76.100
- ☐ 6.02.370(A)(3) Unlawful drug paraphernalia sale/display/store NRS 453.560
- ☐ 6.02.370(A)(3) Employer alcohol awareness card violation NRS 369.630
- ☐ 6.02.370(A)(3) Violation of State law
- ☐ 6.02.370 (B)(1) Violation of business license condition (s)
- ☒ 6.46.100 Failure to maintain adequate room records (three years)
- ☒ Journal ☒ Registration Cards ☒ Receipts Register ☐ Other (See Below)

- ☐ 6.46.130 Unlawfully charging for greater number of days than occupied
- ☒ 6.46.150 Failure to provide, keep, and maintain an adequate public register
  - ☐ Not Available ☒ Inaccurate ☐ Not Properly Bound ☐ Other (See Below)
- ☐ 9.04.030 - Permit or maintain a public nuisance
- ☐ 9.04.030 - 19.12.010 Land Use Table violation
- ☐ 9.04.030 - 19.12.050(B) Special Use Permit violation

**Lodging Addendum Info (check all that apply):**

- ☐ Vending Machines (soda, laundry soap machine, candy/snack machines, etc.)
- ☐ Coin Operated Laundry Facility (whether operated by you or another party)
- ☐ Internet Services
- ☐ Other Services (housekeeping, pest control, parking fees, etc.)
- ☐ Retail Items (phone cards, snacks, money orders, sundries, etc.)
- ☐ Swimming Pool/Spa
- ☐ Units w/ Kitchenettes
- ☐ Number of Rental Units:
  - ☐ Hourly ☐ Daily ☐ Weekly ☐ Monthly ☐ Other
- ☐ Additional Details:

**Brief Description of Violation (s):**

-Business failed to maintain or provide adequate room records, including a current and up to date journal, receipts register and registration cards during today's inspection in violation of LVMC 6.46.100. Correct by 6-20-2023.  
 -Business failed to provide, keep, and maintain an adequate public register in violation of LVMC 6.46.150. You are required to keep the name, address, phone number, room rate, check in and check out times in a bound book or electronically on a computer. Correct by 6-20-2023.

Failure to comply will result in additional re-inspection fees and/or civil fines, as applicable.

- ☐ NO VIOLATIONS IDENTIFIED ☒ **VIOLATION(S) IDENTIFIED; MUST CORRECT ALL VIOLATIONS BY: 6-20-2023**
- ☐ VIOLATION (S) IDENTIFIED; IMMEDIATE COMPLIANCE IS REQUIRED – CEASE AND DESIST ALL UNLAWFUL ACTIVITY.
- ☐ Pursuant to LVMC 6.02.020, Re-inspection Fee Due: ☐ \$99 ☐ \$132
- ☐ Pursuant to LVMC 6.02.460, Civil Fine (s) Due: ☐ \$250 ☐ \$500 ☐ \$750 ☐ \$1,000 ☐ \$1,250 ☐ \$1,500 ☐ \$1,750 ☐ \$2,000 ☐ \$2,500 ☐ \$3,000 ☐ \$

UNDER THE PENALTY OF PERJURY, I CERTIFY THAT I HAVE REASONABLE GROUNDS / PROBABLE CAUSE TO BELIEVE AND DO BELIEVE THAT ABOVE NAMED PERSON (S) / ENTITY COMMITTED THE ABOVE LISTED OFFENSE (S) CONTRARY TO LAW, IF APPLICABLE.

OFFICER PRINTED NAME: Monica Perez OFFICER SIGNATURE: *M. Perez*  
 OFFICER PHONE NUMBER: 702-218-7640 OFFICER E-MAIL: MOPEREZ@LASVEGASNEVADA.GOV

WITHOUT ADMITTING TO HAVING COMMITTED THE ABOVE DESCRIBED OFFENSE (S), I HEREBY ACKNOWLEDGE THIS NOTICE AS OFFICIAL SERVICE FROM THE CITY OF LAS VEGAS AND PROMISE TO RESPOND AS DIRECTED AND TO CORRECT ALL DESCRIBED VIOLATIONS BY THE REQUIRED DATES, IF APPLICABLE. I UNDERSTAND FAILURE TO COMPLY WILL RESULT IN ADVERSE ACTION.

RECIPIENT PRINTED NAME: Lidia Varguez-Casanova RECIPIENT SIGNATURE: *Lidia Varguez-Casanova* ☐ REFUSAL  
 RECIPIENT DATE OF BIRTH: 03-18-1977 ID #: 1604840942 ID STATE: NV PHONE #: (702)385-0809

Method of Service: ☒ Hand Delivered ☐ Certified Mail ☐ Posted ☐ E-Mail: TRAVELERSBEDANDBREAKFAST@GMAIL.COM

**SEE REVERSE SIDE FOR ADDITIONAL INSTRUCTIONS & INFORMATION**



EXHIBIT C

EXHIBIT C

## NOTICE – HOTEL & MOTEL

☐ COURTESY NOTICE ☒ CORRECTION NOTICE ☐ NOTICE OF VIOLATION

City of Las Vegas Department of Community  
Business Licensing Division – Compliance Section

BLE 975677

DBA: TRAVELERS BED & BREAKFAST License Number(s): G63-05293, G63-05479 ☐ UNLICENSED

Location: 1502 S LAS VEGAS BLVD Suite Las Vegas, NV, 89104 Inspection Number:

Inspection Date: 11/15/2023 Time: 1150 Issue Date: 11/15/2023 Time: emailed Multiple Violation Dates: ☒ Yes ☐ No

Mailing Address: 1502 S LAS VEGAS BLVD LAS VEGAS NV 89104 E-Mail: TRAVELERSBEDANDBREAKFAST@GMAIL.COM

NV Business Registration/Entity: NV20131506825 / KNK PROPERTY MANAGEMENT LLC ☒ Active ☐ Expired ☐ Revoked ☐ Default ☐ None

Responsible Parties: ☐ Owner ☐ Key-Employee ☐ Employee ☐ Sole Proprietor ☒ LLC ☐ Corporation ☐ Other:

Name: HOPE KWON DOB: ID #: ID Type:

Name: DOB: ID #: ID Type:

### Las Vegas Municipal Code Reference:

- ☐ 6.02.060(A)(1) Conducting unlicensed business activity
- ☐ 6.02.060(A)(2) Allow/permit another to conduct unlicensed business activity
- ☐ 6.02.060(A)(3) Conducting unlicensed business activity for another
- ☐ 6.02.125 Failure to acquire health card and/or health permit from SNHD
- ☐ 6.02.250(B) Failure to pay delinquent business license fees
- ☐ 6.02.270 Failure to prominently display business license
- ☐ 6.02.290 Failure to report a change of ownership
- ☐ 6.02.310 Failure to report a change of business name
- ☐ 6.02.320(A) Failure to report changes – general license
- ☐ 6.02.370(A)(1) Separate license (s) required for business activity
- ☐ 6.02.370(A)(3) No valid State Business Registration NRS 76.100
- ☐ 6.02.370(A)(3) Unlawful drug paraphernalia sale/display/store NRS 453.560
- ☐ 6.02.370(A)(3) Employer alcohol awareness card violation NRS 369.630
- ☐ 6.02.370(A)(3) Violation of State law
- ☐ 6.02.370 (B)(1) Violation of business license condition (s)
- ☒ 6.46.100 Failure to maintain adequate rooms records (three years)
- ☒ Journal ☒ Registration Cards ☒ Receipts Register ☐ Other (See Below)

- ☐ 6.46.130 Unlawfully charging for greater number of days than occupied
- ☒ 6.46.150 Failure to provide, keep, and maintain an adequate public register
  - ☐ Not Available ☒ Inaccurate ☐ Not Properly Bound ☐ Other (See Below)
- ☐ 9.04.030 - Permit or maintain a public nuisance
- ☐ 9.04.030 - 19.12.010 Land Use Table violation
- ☐ 9.04.030 - 19.12.050(B) Special Use Permit violation
- ☐

### Lodging Addendum Info (check all that apply):

- ☐ Vending Machines (soda, laundry soap machine, candy/snack machines, etc.)
- ☐ Coin Operated Laundry Facility (whether operated by you or another party)
- ☐ Internet Services
- ☐ Other Services (housekeeping, pest control, parking fees, etc.)
- ☐ Retail Items (phone cards, snacks, money orders, sundries, etc.)
- ☐ Swimming Pool/Spa
- ☐ Units w/ Kitchenettes
- ☐ Number of Rental Units:
  - ☐ Hourly ☐ Daily ☐ Weekly ☐ Monthly ☐ Other:
- ☐ Additional Details:

### Brief Description of Violation (s):

-Business failed to maintain or provide adequate room records, including a current and up to date journal, receipts register and registration cards during today's inspection in violation of LVMC 6.46.100. Correct by 11/22/2023.

-Business failed to provide, keep, and maintain an adequate public register in violation of LVMC 6.46.150. No entries have been made since August 2023. You are required to keep the name, address, phone number, room rate, check in and check out times in a bound book or electronically on a computer. Correct by 11/22/2023.

-Review LVMC 6.46 to ensure business is operating in accordance to business licensing code requirements.

Failure to comply will result in additional re-inspection fees and/or civil fines, as applicable.

- ☐ NO VIOLATIONS IDENTIFIED ☒ VIOLATION (S) IDENTIFIED; MUST CORRECT ALL VIOLATIONS BY: 11/22/2023
- ☐ VIOLATION (S) IDENTIFIED; IMMEDIATE COMPLIANCE IS REQUIRED – CEASE AND DESIST ALL UNLAWFUL ACTIVITY.
- ☒ Pursuant to LVMC 6.02.020, Re-inspection Fee Due: ☒ \$99 ☐ \$132

☐ Pursuant to LVMC 6.02.460, Civil Fine (s) Due: ☐ \$250 ☐ \$500 ☐ \$750 ☐ \$1,000 ☐ \$1,250 ☐ \$1,500 ☐ \$1,750 ☐ \$2,000 ☐ \$2,500 ☐ \$3,000 ☐ \$

UNDER THE PENALTY OF PERJURY, I CERTIFY THAT I HAVE REASONABLE GROUNDS / PROBABLE CAUSE TO BELIEVE AND DO BELIEVE THAT ABOVE NAMED PERSON (S) / ENTITY COMMITTED THE ABOVE LISTED OFFENSE (S) CONTRARY TO LAW, IF APPLICABLE.

OFFICER PRINTED NAME: Monica Perez OFFICER SIGNATURE: M. Perez

OFFICER PHONE NUMBER: 702-218-7640 OFFICER E-MAIL: MOPEREZ@LASVEGASNEVADA.GOV

WITHOUT ADMITTING TO HAVING COMMITTED THE ABOVE DESCRIBED OFFENSE (S), I HEREBY ACKNOWLEDGE THIS NOTICE AS OFFICIAL SERVICE FROM THE CITY OF LAS VEGAS AND PROMISE TO RESPOND AS DIRECTED AND TO CORRECT ALL DESCRIBED VIOLATIONS BY THE REQUIRED DATES, IF APPLICABLE. I UNDERSTAND FAILURE TO COMPLY WILL RESULT IN ADVERSE ACTION.

RECIPIENT PRINTED NAME: Hope Kwon (emailed) RECIPIENT SIGNATURE: ☐ REFUSAL

RECIPIENT DATE OF BIRTH: ID #: ID STATE: PHONE #:

Method of Service: ☐ Hand Delivered ☐ Certified Mail ☐ Posted ☒ E-Mail: TRAVELERSBEDANDBREAKFAST@GMAIL.COM

SEE REVERSE SIDE FOR ADDITIONAL INSTRUCTIONS & INFORMATION

EXHIBIT D

EXHIBIT D

## NOTICE – HOTEL & MOTEL

☐ COURTESY NOTICE ☒ CORRECTION NOTICE ☐ NOTICE OF VIOLATION

City of Las Vegas Department of Community  
Business Licensing Division – Compliance Section

BLE 975677

DBA: TRAVELERS BED & BREAKFAST License Number(s): G63-05293, G63-05479 ☐ UNLICENSED

Location: 1502 S LAS VEGAS BLVD Suite Las Vegas, NV, 89104 Inspection Number:

Inspection Date: 2/13/2024 Time: 940 Issue Date: 2-14-2024 Time: emailed Multiple Violation Dates: ☒ Yes ☐ No

Mailing Address: 1502 S LAS VEGAS BLVD LAS VEGAS NV 89104 E-Mail: TRAVELERSBEDANDBREAKFAST@GMAIL.COM

NV Business Registration/Entity: NV20131506825 / KNK PROPERTY MANAGEMENT LLC ☒ Active ☐ Expired ☐ Revoked ☐ Default ☐ None

Responsible Parties: ☐ Owner ☐ Key-Employee ☐ Employee ☐ Sole Proprietor ☒ LLC ☐ Corporation ☐ Other:

Name: HOPE KWON DOB: ID #: ID Type:

Name: DOB: ID #: ID Type:

### Las Vegas Municipal Code Reference:

- |  |   |
|--|---|
| <ul style="list-style-type: none"><li><input type="checkbox"/> 6.02.060(A)(1) Conducting unlicensed business activity</li><li><input type="checkbox"/> 6.02.060(A)(2) Allow/permit another to conduct unlicensed business activity</li><li><input type="checkbox"/> 6.02.060(A)(3) Conducting unlicensed business activity for another</li><li><input type="checkbox"/> 6.02.125 Failure to acquire health card and/or health permit from SNHD</li><li><input type="checkbox"/> 6.02.250(B) Failure to pay delinquent business license fees</li><li><input type="checkbox"/> 6.02.270 Failure to prominently display business license</li><li><input type="checkbox"/> 6.02.290 Failure to report a change of ownership</li><li><input type="checkbox"/> 6.02.310 Failure to report a change of business name</li><li><input type="checkbox"/> 6.02.320(A) Failure to report changes – general license</li><li><input checked="" type="checkbox"/> 6.02.370(A)(1) Separate license (s) required for business activity</li><li><input type="checkbox"/> 6.02.370(A)(3) No valid State Business Registration NRS 76.100</li><li><input type="checkbox"/> 6.02.370(A)(3) Unlawful drug paraphernalia sale/display/store NRS 453.560</li><li><input type="checkbox"/> 6.02.370(A)(3) Employer alcohol awareness card violation NRS 369.630</li><li><input type="checkbox"/> 6.02.370(A)(3) Violation of State law</li><li><input type="checkbox"/> 6.02.370 (B)(1) Violation of business license condition (s)</li><li><input checked="" type="checkbox"/> 6.46.100 Failure to maintain adequate rooms records (three years)</li><li><input checked="" type="checkbox"/> Journal <input checked="" type="checkbox"/> Registration Cards <input checked="" type="checkbox"/> Receipts Register <input type="checkbox"/> Other (See Below)</li></ul> | <ul style="list-style-type: none"><li><input type="checkbox"/> 6.46.130 Unlawfully charging for greater number of days than occupied</li><li><input checked="" type="checkbox"/> 6.46.150 Failure to provide, keep, and maintain an adequate public register<ul style="list-style-type: none"><li><input type="checkbox"/> Not Available <input checked="" type="checkbox"/> Inaccurate <input type="checkbox"/> Not Properly Bound <input type="checkbox"/> Other (See Below)</li></ul></li><li><input type="checkbox"/> 9.04.030 - Permit or maintain a public nuisance</li><li><input type="checkbox"/> 9.04.030 - 19.12.010 Land Use Table violation</li><li><input type="checkbox"/> 9.04.030 - 19.12.050(B) Special Use Permit violation</li><li><input checked="" type="checkbox"/> 8.86</li></ul> |
|--|---|

### Lodging Addendum Info (check all that apply):

- ☐ Vending Machines (soda, laundry soap machine, candy/snack machines, etc.)
- ☐ Coin Operated Laundry Facility (whether operated by you or another party)
- ☐ Internet Services
- ☐ Other Services (housekeeping, pest control, parking fees, etc.)
- ☐ Retail Items (phone cards, snacks, money orders, sundries, etc.)
- ☐ Swimming Pool/Spa
- ☐ Units w/ Kitchenettes
- ☒ Number of Rental Units: 26
  - ☐ Hourly ☒ Daily ☒ Weekly ☒ Monthly ☐ Other:
- ☒ Additional Details: tenants onsite long-term

### Brief Description of Violation (s):

- Business failed to maintain or provide adequate room records, including a current and up to date journal, receipts register and registration cards during today's inspection in violation of LVMC 6.46.100. Immediate compliance required.
- Business failed to provide, keep, and maintain an adequate public register in violation of LVMC 6.46.150. No entries have been made since January 1, 2024. You are required to keep the name, address, phone number, room rate, check in and check out times in a bound book or electronically on a computer. Immediate compliance required.
- Tenants have stayed on property longer than 30+ days outside the scope of approved licensing. Property is not licensed for extended stay-license only allows daily and weekly rentals. Cease unapproved activity immediately.

Failure to comply will result in additional re-inspection fees and/or civil fines, as applicable.

☐ NO VIOLATIONS IDENTIFIED ☐ VIOLATION (S) IDENTIFIED; MUST CORRECT ALL VIOLATIONS BY:   
☒ VIOLATION (S) IDENTIFIED; IMMEDIATE COMPLIANCE IS REQUIRED – CEASE AND DESIST ALL UNLAWFUL ACTIVITY.   
☒ Pursuant to LVMC 6.02.020, Re-inspection Fee Due: ☐ \$99 ☒ \$132

☐ Pursuant to LVMC 6.02.460, Civil Fine (s) Due: ☐ \$250 ☐ \$500 ☐ \$750 ☐ \$1,000 ☐ \$1,250 ☐ \$1,500 ☐ \$1,750 ☐ \$2,000 ☐ \$2,500 ☐ \$3,000 ☐ \$

UNDER THE PENALTY OF PERJURY, I CERTIFY THAT I HAVE REASONABLE GROUNDS / PROBABLE CAUSE TO BELIEVE AND DO BELIEVE THAT ABOVE NAMED PERSON (S) / ENTITY COMMITTED THE ABOVE LISTED OFFENSE (S) CONTRARY TO LAW, IF APPLICABLE.

OFFICER PRINTED NAME: Monica Perez OFFICER SIGNATURE: *M. Perez*  
OFFICER PHONE NUMBER: 702-218-7640 OFFICER E-MAIL: MOPEREZ@LASVEGASNEVADA.GOV

WITHOUT ADMITTING TO HAVING COMMITTED THE ABOVE DESCRIBED OFFENSE (S), I HEREBY ACKNOWLEDGE THIS NOTICE AS OFFICIAL SERVICE FROM THE CITY OF LAS VEGAS AND PROMISE TO RESPOND AS DIRECTED AND TO CORRECT ALL DESCRIBED VIOLATIONS BY THE REQUIRED DATES, IF APPLICABLE. I UNDERSTAND FAILURE TO COMPLY WILL RESULT IN ADVERSE ACTION.

RECIPIENT PRINTED NAME: Hope Kwon (emailed) RECIPIENT SIGNATURE: ☐ REFUSAL

RECIPIENT DATE OF BIRTH: ID #: ID STATE: PHONE #:

Method of Service: ☐ Hand Delivered ☐ Certified Mail ☐ Posted ☒ E-Mail: TRAVELERSBEDANDBREAKFAST@GMAIL.COM

SEE REVERSE SIDE FOR ADDITIONAL INSTRUCTIONS & INFORMATION

**EXHIBIT E**

**EXHIBIT E**



## City of Las Vegas

## IMP Inspection Result

Inspection #: 3183147

AP #: I-15936

**FAILED**

Inspection Date: 02/21/2024

IMMEDIATE COMPLIANCE REQUIRED

Inspector: Kyle E Donahue

Reinspection on or after: 3/20/2024

## Business Name:

TRAVELERS BED AND BREAKFAST

## Inspection Type:

554 - (Fire Prevention Inspection)

## Address:

1502 S Las Vegas Blvd

## Location:

## Comments:

Assisted CLV Code Enforcement, CLV Business License Enforcement, CLV Building Dept., and Metro PD with joint inspection.

Code Section	Problems / Violations	Status
2021 603.4	<b>Provide 36 inches of clearance around electrical panels</b> Provide 36 inches of clearance around all electrical panels throughout, specifically in maintenance/storage area on 1st floor	
2021 603.2.2	<b>Provide filler plates to cover empty slots in breaker panel</b> In breaker panel in maintenance/storage area on 1st floor	
2021 1008.1	<b>Provide and/or repair emergency lighting</b> Repair or replace inoperable emergency/exit lighting throughout as needed	
2021 1013.3	<b>Provide and/or repair EXIT sign lighting</b> Repair or replace inoperable emergency/exit lighting throughout as needed	
2021 907.6.6	<b>Provide monitoring for fire alarm</b> NextGen has an open permit for fire alarm monitoring take over. Inspection and testing with NextGen needs to be completed to close out permit	
2021 703.1	<b>Repair breached wall/ceiling</b> Throughout as needed, specifically in maintenance/storage area on 1st floor	
2021 NAC 477.410	<b>Service fire extinguishers by a Nevada state licensee</b> (1) Portable fire extinguisher on 2nd floor corridor is missing inspection tag. Have a Nevada State Fire Marshal licensed contractor service and tag extinguisher	
2021 906.2	<b>Repair or replace damaged fire extinguisher</b> (1) Portable fire extinguisher at exterior auxiliary building has lost pressure and is missing pull pin. Have a Nevada State Fire Marshal licensed contractor repair or replace the extinguisher as needed	

**EXHIBIT F**

**EXHIBIT F**

\*\*\*\*NOTICE AND DECLARATION OF CHRONIC NUISANCE\*\*\*\*

Via Certified Mail, Return Receipt Requested  
and  
Hand Delivered to Property Address

02/16/2024

Chronic Nuisance Location: 1502 S Las Vegas Blvd  
Las Vegas, NV 89104

Parcel Number: 16203210064

Owner's Name and Address: Hope Qwon Chung  
1502 S Las Vegas Blvd  
Las Vegas, NV 89104

WHY ARE YOU RECEIVING THIS NOTICE?

Pursuant to Las Vegas Municipal Code ("LVMC") § 9.04.110, you are hereby notified as owner(s) of the property located at and commonly known as 1502 S Las Vegas Blvd, Las Vegas, NV 89104 APN# 16203210064 (hereinafter "Property"), that the Las Vegas Metropolitan Police Department ("LVMPD") declares the existence of a chronic nuisance at the Property.

WHAT IS A CHRONIC NUISANCE?

Pursuant to LVMC § 9.04.010, "chronic nuisance" means the existence of any of the following conditions [with emphasis added]:

- (1) When three or more nuisance activities exist or have occurred during any thirty-day period on a property;
- (2) When a person associated with the property has engaged in three or more nuisance activities during any thirty-day period on the property or within one hundred feet of the property;
- (3) When the property has been the subject of a search warrant based on probable cause of continuous or repeated violations of NRS Chapter 459;



- (4) When a building or place is used for the purpose of unlawfully selling, serving, storing, keeping, manufacturing, using or giving away a controlled substance, immediate precursor as defined in NRS 453.086 or controlled substance analog as defined in NRS 453.043; or
- (5) When a building or place was used for the purpose of unlawfully manufacturing a controlled substance, immediate precursor or controlled substance analog and:
  - (a) The building or place has not been deemed safe for habitation by a governmental entity; or
  - (b) All materials or substances involving the controlled substance, immediate precursor or controlled substance analog have not been removed from or remediated on the building or place by an entity certified or licensed to do so within one hundred eighty days after the building or place is no longer used for the purpose of unlawfully manufacturing a controlled substance, immediate precursor or controlled substance analog.

For purposes of the above, and pursuant to LVMC § 9.04.010, “nuisance activity” means any of the following conditions:

- (1) Any area, structure or object which by its nature, location, or character would tend to attract and endanger the safety of any minor person.
- (2) Any violation of Title 16, including violations of the codes pertaining to building, construction, housing, and fire safety adopted thereunder.
- (3) Any body of water which by its nature or location constitutes an unhealthy or unsafe condition, including any accumulation of stagnant water...
- (4) Any refuse, waste, litter or other material, regardless of its market value, which, by reason of its location or character, is unsightly or interferes with the reasonable use and enjoyment of adjacent properties, has a detrimental effect upon adjacent property values, or would hamper or interfere with the containment of fire upon the premises...
- (5) Any violation of Title 19 [Zoning] or Title 20 [Flood Control] of this Code.
- (6) Operating a business without a current license as required by Title 6.
- (7) An odor nuisance as described in LVMC Chapter 9.40.
- (8) A chronically-blighted property.
- (9) Any other act or condition, other than those permitted by NRS 40.140 and 202.450, which, by reason of its nature, character or location, interferes with the reasonable use and enjoyment of adjacent properties, or which has a detrimental effect upon adjacent property values. Such nuisances include without limitation the following:
  - (a) Weeds...;
  - (b) Dead trees, plants and other vegetation...;
  - (c) Graffiti, as defined in LVMC 10.48.060, that is allowed to remain for more than twenty-four hours;
  - (d) Unpainted or painted buildings, walls, fences or other structures whose condition has become so deteriorated as to create a hazardous condition; ...or create a condition of blight visible from public right-of-way;

- (e) Any vehicle that has been abandoned, or any vehicle in an obviously mechanically inoperable condition...
- (f) Criminal activity on any lot or premises within the City.

WHAT DID LVMPD IDENTIFY FROM YOUR PROPERTY THAT CONSTITUTES THE CHRONIC NUISANCE?

LVMPD has identified the following conditions which constitute nuisance activities:

	Date	Description	Event #
1	02/11/24	On 02/11/24 a subject was stabbed in the abdomen multiple times during a fight that ensued in front of the Travelers. The subject was located upstairs bleeding profusely. It is believed the event occurred over a narcotics dispute.  Video evidence showed multiple narcotics transactions occurred on property prior to the stabbing.	LLV240200039018
2	01/24/24	On 01/24/24 a subject was stabbed in front of 1502 S Las Vegas Blvd. During investigation, owner indicated the business had good security camera system; however, purported security guard, who is resident of the property, informed detective that the video system was not operable during the stabbing incident. Event believed to be connected to resident of the property.	LLV240100082401
3	01/2024- Current	Multiple narcotics overdose events at or near the Travelers.	

The Property was previously issued Notice and Declaration of Chronic Nuisance letters on March 15, 2023, and April 5, 2023. The property owner failed to contact LVMPD Downtown Area Command regarding either of the previously issued notices of chronic nuisance. The property owner also refused to communicate with Downtown Area Command regarding the ongoing criminal activity at the property when the Area Command attempted to reach out to the property owner.

Following issuance of the April 5, 2023, Notice and Declaration of Chronic Nuisance, criminal activity including violent crime and narcotics activity has continued associated with the property. A homicide occurred on October 10, 2023 (LLV231000075464), linked to a room break in at the property. Search warrants connected to investigations of narcotics activities occurring at the property were executed in June (LLV230600020214), October (LLV231000091357), and

December 2023 (LLV231200074793). During execution of the search warrant in December 2023 at the property, a security guard affirmatively attempted to stop/delay officers from effectuating the judicially authorized search.

WHAT DO YOU NEED TO DO NEXT?

The above conditions need to be abated by March 17th 2024 (30 days from now) in order to prevent the matter from being submitted to the Las Vegas City Attorney for legal action. This means you will desist, remedy, and prevent persons on the Property from continuing or undertaking the nuisance activities described above.

You are requested to contact LVMPD Downtown Area Command Community Oriented Policing Office at 702-828-3844 Monday thru Thursday between 8 a.m. and 3 p.m. or come in person to Downtown Area Command at 621 N 9<sup>th</sup> Street, Las Vegas, NV 89104, Monday thru Thursday between 8 a.m. and 3p.m to discuss recommended means by which to abate. These include:

- Employ trained and adequate non-resident security personnel, and operable security cameras;
- The implementation of a policy requiring guests to present picture identification prior to renting space and to register their vehicles at check-in;
- The use of publicdata.com, or some similar website, to check the backgrounds of all prospective renters;
- The implementation of a policy preventing the lease of space to convicted felons;
- The implementation of a policy requiring the owner to keep records of all background checks;
- The implementation of policies governing visiting hours, trespassers, and evictions;
- The trespassing and eviction of any visitors at the Property after visiting hours, and trespassing of persons loitering on the property;
- The participation in the Identify, Detect, and Locate program, which requires the owner to forward information about renters to LVMPD for the purpose of locating wanted criminals;
- Policies to detect and prevent "straw" renters including non-cash payment for rooms, picture identification checks, and checking that occupants are in fact the renter.

CAN YOU OBJECT TO THIS NOTICE AND DECLARATION OF CHRONIC NUISANCE?

Yes. You have the opportunity for a hearing before a court of competent jurisdiction.

WHAT WILL HAPPEN IF YOU FAIL TO TAKE STEPS TO ABATE THE CHRONIC NUISANCE?

LVMPD and the Community Oriented Policing Division are committed to working closely and aggressively with the City of Las Vegas to identify and correct problems in this community that lead to crime. We are also committed to assisting homeowners, business owners, and citizens of

Las Vegas to achieve a higher quality of living. We strive to make Las Vegas the "Safest City in America." Therefore, we are committed to helping you through this process and will commit whatever resources necessary to help you create a safe environment.

With that said, failure to abate the Chronic Nuisance by April 15th, 2023 (30 days from now), may result in LVMPD requesting the Las Vegas City Attorney to file an abatement action against you pursuant to LVMC § 9.04.120. This may result in the closure of the Property, the abatement of the Property in some other way, and/or the imposition of fines and/or abatement costs.

Sincerely,

Captain Brandon Oris P# 13464  
Downtown Area Command  
Community Policing Division  
702-828-3844

LVMPD Downtown Area Command C.O.P. Supervisor



cc: S. Scott Greenberg, Esq., Assistant General Counsel, LVMPD  
Rebecca Wolfson, Esq., Deputy City Attorney, City of Las Vegas  
rwolfson@lasvegasnevada.gov

RECEIVED on 2/15/24 @ 1650 HRS By:

HOPE KWON-CHUNG



WITNESS:

SGT. J. ROTHENBURG P# 13449

