



## FACTUAL ALLEGATIONS

1  
2 1. RESPONDENT holds a supervising community manager certificate from the  
3 Division, license CAM.0007333-SUPR, said license being in "active" status at the time of  
4 filing this complaint.

5 2. During all relevant times alleged herein, RESPONDENT was employed by  
6 Pinnacle Community Association Management ("Pinnacle") as the community manager  
7 for Sierra Madre Homeowners Association ("Association") through August of 2018.

8 3. Epic Association Management ("Epic") took over management of the  
9 Association in approximately September of 2018.

10 4. Epic filed a complaint with the Division, alleging in part, that  
11 RESPONDENT allowed board member Srdjan Pantic ("Pantic"), and/or his companies, to  
12 complete repairs for the Association and to be compensated for his services by  
13 RESPONDENT'S or by Pantic's signing Association checks, despite neither being listed as  
14 signatories to the Association's bank accounts.

15 5. On June 28, 2019, the Association, through Epic, sent RESPONDENT a  
16 letter stating in part, that during her management of the Association, RESPONDENT:

17 (1) permitted board member Pantic to submit proposals to perform work for the  
18 Association that he was not licensed to perform, (2) failed to take pertinent steps to ensure  
19 Pantic was licensed and insured to perform work for the Association, (3) failed to notify  
20 the Board that a board member is not permitted by Nevada law to do work for the  
21 association while on the board in exchange for compensation, (4) allowed the Association  
22 to pay Pantic \$421,671.04 through his companies Nevada Property Concepts and Tesla  
23 Property Concepts over the course of just over a year for work he performed for the  
24 Association, (5) signed 31 checks to Pantic despite not being a signatory to the  
25 Association's bank account, and (6) allowed Pantic to sign 48 checks while not being a  
26 signatory to the Association's bank account.

27 6. On July 31, 2019, the Division properly notified RESPONDENT that it had  
28 received a complaint against her and requested a response to the allegations set forth in

1 the Division's letter.

2 7. RESPONDENT responded to the Division's investigation.

3 8. In her response to the Division, RESPONDENT stated that she did not allow  
4 Pantic to submit proposals to do work for the Association but obtained three bids from  
5 outside vendors and that the Board then made the decision to hire Pantic.

6 9. RESPONDENT further claimed to have informed the Board that a sitting  
7 board member was not permitted to perform work for the Association in exchange for  
8 compensation, but that the Board chose to hire Pantic anyway because he was much  
9 cheaper than the other vendors.

10 10. RESPONDENT stated she did not pay Pantic for the work he performed for  
11 the Association, but that the Board did, and that she was allowed to sign checks for the  
12 Association because she was a signatory to the Association's bank account as was Pantic.

13 11. Board members claim they relied on RESPONDENT's representation's  
14 Pantic was licensed to perform work for the Association and they never approved any of  
15 Pantic's invoices because RESPONDENT just paid them.

16 12. RESPONDENT further stated that she is no longer working in the industry,  
17 and that because she no longer works for Pinnacle, she could not provide documentation  
18 to back up her responses to the Division.

19 13. Association meeting minutes do not reflect that RESPONDENT obtained  
20 Board authorization or approval for Pantic's services.

21 14. While managing the Association, RESPONDENT permitted unlicensed  
22 contractor Pantic to perform Association work.

23 15. While managing the Association, RESPONDENT signed Association checks  
24 payable to board member Pantic (either personally and/or through his companies) for work  
25 he performed for the Association, without obtaining Board approval.

26 16. RESPONDENT permitted Pantic to sign multiple checks from Association  
27 accounts (including checks to compensate himself for the work he performed for the  
28 Association) despite him not being a signatory.



1 and (b)) by committing professional incompetence by demonstrating a significant lack of  
2 ability, knowledge or fitness to perform a duty or obligation owed to the Association and  
3 by failing to exercise reasonable skill and care with respect to a duty owed to the  
4 Association.

5 **DISCIPLINE AUTHORIZED**

6 Pursuant to the provisions of NAC 116A.360 the Commission has discretion to  
7 impose discipline as it deems appropriate, including, but not limited to one or more of the  
8 following actions:

- 9 1. Revoke or suspend the certificate;
- 10 2. Refuse to renew or reinstate the certificate;
- 11 3. Place the community manager on probation;
- 12 4. Issue a reprimand or censure to the community manager;
- 13 5. Impose a fine of not more than \$5,000 for each violation of a statute or  
14 regulation;
- 15 6. Require the community manager to pay restitution;
- 16 7. Require the community manager to pay the costs of the investigation and  
17 hearing;
- 18 8. Require the community manager to obtain additional education relating to  
19 the management of common-interest communities; and
- 20 9. Take such other disciplinary action as the Commission deems appropriate.

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

23 **NOTICE OF HEARING**

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

28 **THE HEARING WILL TAKE PLACE** at the Commission meeting scheduled

1 for June 1-3, 2021, beginning at approximately 9:00 a.m. each day, or until such  
2 time as the Commission concludes its business. The Commission uses WebEx for its  
3 meetings. To join the hearing go to the website Webex.com and put in the Meeting ID and  
4 Password:

5 **TUESDAY, JUNE 1, 2021**                      **MEETING NUMBER ACCESS CODE: 146 354 4074**  
6                      **MEETING PASSWORD: gJmpEp32E2 (45673733232 from phones and video systems)**

7 **WEDNESDAY, JUNE 2, 2021**                      **MEETING NUMBER ACCESS CODE: 146 462 9950**  
8                      **MEETING PASSWORD: JpKZBPq8r77 (57592778777 from phones and video systems)**

9 **THURSDAY, JUNE 3, 2021**                      **MEETING NUMBER ACCESS CODE: 146 515 5878**  
10                      **MEETING PASSWORD: Yxt7M7xdej9 (99876793359 from phones and video systems)**

11 If you do not have internet access, you may attend by phone at (844) 621-3956. Some  
12 mobile devices may ask attendees to enter a numeric meeting password provided above. If  
13 you would like an email containing this information, before the hearing, please contact  
14 Kelly Valadez, Commission Coordinator, at (702) 486-4606 or KValadez@red.nv.gov.

15 **STACKED CALENDAR:** Your hearing is one of several hearings that may  
16 be scheduled at the same time as part of a regular meeting of the Commission  
17 that is expected to take place on June 1-3, 2021. Thus, your hearing may be  
18 continued until later in the day or from day to day. It is your responsibility to  
19 be present when your case is called. If you are not present when your hearing is  
20 called, a default may be entered against you and the Commission may decide the  
21 case as if all allegations in the complaint were true. If you need to negotiate a  
22 more specific time for your hearing in advance, please call Kelly Valadez,  
23 Commission Coordinator, at (702) 486-4606.

24 **YOUR RIGHTS AT THE HEARING:** Except as mentioned below, the hearing is  
25 an open meeting under Nevada's open meeting law and may be attended by the public.  
26 After the evidence and arguments, the commission may conduct a closed meeting to  
27 discuss your alleged misconduct or professional competence. You are entitled to a copy of  
28 the transcript of the open and closed portions of the meeting, although you must pay for  
the transcription.

1 As a RESPONDENT, you are specifically informed that you have the right to appear  
2 and be heard in your defense, either personally or through your counsel of choice. At the  
3 hearing, the Division has the burden of proving the allegations in the complaint and will  
4 call witnesses and present evidence against you. You have the right to respond and to  
5 present relevant evidence and argument on all issues involved. You have the right to call  
6 and examine witnesses, introduce exhibits, and cross-examine opposing witnesses on any  
7 matter relevant to the issues involved.

8 You have the right to request that the Commission issue subpoenas to compel  
9 witnesses to testify and/or evidence to be offered on your behalf. In making this request,  
10 you may be required to demonstrate the relevance of the witness's testimony and/or  
11 evidence. Other important rights and obligations, including your obligation to answer the  
12 complaint, you have are listed in NRS Chapters 116 and 116A and NAC 116 and 116A,  
13 including without limitation, NAC 116A.560 through NAC 116A.655, and NRS Chapter  
14 233B.

15 Note that under NAC 116A.585, not less than five (5) working days before a hearing,  
16 RESPONDENT must provide to the Division a copy of all reasonably available documents  
17 that are reasonably anticipated to be used to support his or her position, and a list of  
18 witnesses RESPONDENT intends to call at the time of the hearing. Failure to  
19 provide any document or to list a witness may result in the document or witness being  
20 excluded from RESPONDENT'S defense. The purpose of the hearing is to determine if  
21 the RESPONDENT has violated any of the provisions of NRS Chapter 116A, and to  
22 determine what administrative penalty is to be assessed against RESPONDENT.

23 DATED this 16<sup>th</sup> day of April, 2021.

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

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