

1 BEFORE THE COMMISSION FOR COMMON-INTEREST
2 COMMUNITIES AND CONDOMINIUM HOTELS
3 STATE OF NEVADA

3 Sharath Chandra, Administrator,
4 Real Estate Division, Department of
5 Business & Industry, State of Nevada,

6 Petitioner,

7 vs.

8 Amy M. Moore,
9 (CAM.0009792-SUPR)

10 Respondent.

Case Nos. 2025-149; 2025-503

FILED

NOV 05 2025

NEVADA COMMISSION FOR
COMMON INTEREST COMMUNITIES
AND CONDOMINIUM HOTELS

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11 **COMPLAINT FOR DISCIPLINARY**
12 **ACTION AND NOTICE OF HEARING**

13 The Real Estate Division of the Department of Business and Industry, State of
14 Nevada (the "Division"), by and through its counsel, Aaron D. Ford, Attorney General of
15 the State of Nevada, and Phil W. Su, Senior Deputy Attorney General, hereby notifies
16 Amy M. Moore ("Moore" and/or "RESPONDENT") of an administrative hearing before the
17 Commission for Common-Interest Communities and Condominium Hotels, State of
18 Nevada, which is to be held pursuant to Chapters 233B and Chapters 116 and 116A of the
19 Nevada Revised Statutes ("NRS") and Chapter 116 and 116A of the Nevada
20 Administrative Code ("NAC"). The purpose of the hearing is to consider the allegations
21 stated below and to determine if an administrative penalty will be imposed on the
22 RESPONDENT pursuant to the provisions of NRS and NAC including, but not limited to,
23 NAC 116A.360.

24 **JURISDICTION AND NOTICE**

25 During all relevant times mentioned in this complaint, RESPONDENT held an
26 active supervising community manager certificate from the Division (CAM.0009792-
27 SUPR) and is, therefore, subject to the jurisdiction of the Division and the provisions of
28 NRS Chapters 116 and 116A and NAC Chapters 116 and 116A.

...

1 **GENERAL FACTUAL ALLEGATIONS**

2 1. RESPONDENT AMY M. MOORE has been licensed as a temporary
3 community manager, community manager, and/or a supervising community manager in
4 Nevada since July 2019. [CICCH0001-0003]

5 2. At all times relevant herein, RESPONDENT held a supervising community
6 manager certificate issued by the Division (CAM.0009792-SUPR), and served as
7 supervising community manager with Vintage Real Estate Group Inc. [CICCH0001]

8 3. At all times relevant herein, the RESPONDENT served as the supervising
9 community manager for Cielo Vista Community Association (“Cielo Vista”) and Majestic
10 Point Community Association (“Majestic Point”). [CICCH0015-0016; CICCH0049]

11 4. Investigation Case No. 2025-149 was initiated by the Division’s compliance
12 division based on documentation from the Secretary of State’s website reflecting that
13 RESPONDENT was currently serving as a member of Cielo Vista’s executive board while
14 simultaneously providing services as a community manager. [CICCH0005-0008]

15 **FACTUAL ALLEGATIONS REGARDING CASE NO. 2025-149**

16 5. On March 5, 2025, the Division issued a Request for Information (RFI) letter
17 regarding the Secretary of State’s documentation, as well as meeting minutes, financial
18 statements, bank statements, and the most current reserve study. [CICCH0009-0010]

19 6. A second RFI request was issued on April 1, 2025. [CICCH0011-0012]

20 7. On April 14, 2025, Colleen Rozen, Director of Operations for Vintage Group,
21 responded to the RFI with the Annual Association Registration, showing that the
22 RESPONDENT was not an executive board member, but serves as Manager for Cielo
23 Vista. [CICCH0013-0016]

24 8. The following day, the Division responded via email that the requested
25 records still needed to be provided to the Division. [CICCH0013].

26 9. On May 29, 2025, the Division emailed Rozen again, noting the documents
27 had not yet been provided. [CICCH0017-0020]

28 10. A third RFI request was issued on June 4, 2025. [CICCH0021-0022]

1 11. A fourth and final RFI request was issued on June 17, 2025. [CICCH0023-
2 0024]

3 12. On June 20, 2025, CAM William Newbourg sent an email to the Division
4 again noting that the RESPONDENT was not a Cielo Vista executive board member but
5 serves as Manager for Cielo Vista. [CICCH0025-0026]

6 13. On June 25, 2025, the Division sent yet another written request for the
7 records and documentation indicated in the preceding RFIs. [CICCH0027-0028]

8 14. On June 30, 2025, RESPONDENT provided the requested documents in her
9 possession, including financial records from January 2024 through February 2025.
10 [CICCH0029; 0030-0051]

11 15. The financial records provided by Respondent included a total of nineteen
12 (19) check stubs: for checks #100022-100025 and 100027-100038, showing payments made
13 to Brightview Landscaping Services, Inc.; CAIS, LLC; LaBarre/Osknee Insurance;
14 Newman and Associates; Complex Solutions, Ltd.; and NRED; and for checks #1037-1039,
15 showing payments made to Galt Equities, LLC; Orvil Yhair Garita; and "Danny or Lenibel
16 Reynolds." [CICCH0030-0051]

17 16. The check stubs were dual-signed by RESPONDENT and by a person
18 identified by RESPONDENT as Vintage Group's Director of Operations, and not by any of
19 Cielo Vista's executive board members. [CICCH0030-0051; 0059].

20 17. On July 7, 2025, the Division sent RFI letters to Cielo Vista executive board
21 members Manuel Reynaga, Dwayne Johnson, and Iris Flores inquiring as to how board
22 meetings were held, how the annual budget was approved, how checks were approved and
23 signed, how elections were held, and how often the board reviewed the association
24 financials. [CICCH0052-053].

25 18. On July 16, 2025, board member Reynaga send his response to the Division
26 noting, among other things, that "3. We haven't had to sign invoices or checks recently, as
27 there have been no reserve expenses. Payments are set up via autopay." [CICCH0054-
28 0055].

1 19. Also on July 16, 2025, board member Johnson responded to the Division
2 noting, "The invoices are on autopay with Strongroom and there are digital signatures.
3 We have not had any reserve expenses that require 2 board member signatures thus far."
4 [CICCH0056].

5 20. On September 22, 2025, the Division sent an additional RFI letter to
6 RESPONDENT regarding her permitting an individual who was neither a Nevada-
7 certified community manager, a duly elected board member, nor an officer of the
8 Association to sign Association Checks from at least September 2021 through March 2025.
9 [CICCH0057-0058].

10 21. On October 1, 2025, RESPONDENT sent a reply letter indicating that the
11 checks from Cielo Vista's operating account were signed by herself, as community
12 manager, and by Vintage Group's "Director of Operations," which was "an error that we
13 have corrected, unfortunately it was a setting in our system that applied to communities
14 outside of Nevada." [CICCH0059]

15 22. On October 6, 2025, the Division sent RESPONDENT an NRS 233B letter
16 indicating that through its investigation it obtained sufficient evidence to commence
17 disciplinary action by filing a complaint for disciplinary action before the Commission.
18 [CICCH0060-0061].

19 **FACTUAL ALLEGATIONS REGARDING CASE NO. 2025-503**

20 23. On July 24, 2025, the Division issued a Request for Information (RFI) letter
21 regarding her permitting an individual to sign Majestic Point Association check #100005
22 dated 8/26/24, who was neither a Nevada-certified community manager, a duly elected
23 board member, nor an officer of Majestic Point. The RFI requested copies of bank
24 statements, financial statements, and meeting minutes from 2024 through the present,
25 and the most recent reserve study. [CICCH0064-0065]

26 24. On July 28, 2025, RESPONDENT sent a reply letter indicating that
27 Operating Check #100005 was signed by "myself, the community manager and our
28 Operations Manager" and noted that "[w]e have modified operating checks to only be

1 signed by the Board of Directors,” and including attached financial statements for the
2 requested timeframe. [CICCH0066-0082]

3 25. The twelve (12) check stubs included in those financial records showed
4 payments made to “Sunstate Companies LLC” and NRED. [CICCH0083].

5 26. The check stubs were dual-signed by RESPONDENT and by Vintage Group’s
6 Operations Manager, and not by any of Majestic Point’s executive board members.
7 [CICCH0066-0082].

8 27. On September 23, 2025, the Division sent RESPONDENT an NRS 233B
9 letter indicating that through its investigation it obtained sufficient evidence to commence
10 disciplinary action by filing a complaint for disciplinary action before the Commission.
11 [CICCH0083-0085].

12 VIOLATIONS OF LAW

13 1. RESPONDENT violated NRS 116A.630(1)(b) pursuant to NAC 116A.355 by
14 failing to exercise ordinary and reasonable care in the performance of her duties when
15 RESPONDENT repeatedly allowed checks to be drawn, on at least nineteen (19) occasions,
16 from the Operating Account for Cielo Vista with the signature of Vintage Group’s
17 Operations Manager/Director of Operations, who was neither a duly elected board
18 member, nor an officer, of Cielo Vista.

19 2. RESPONDENT violated NRS 116.31153(2) pursuant to NAC 116A.355(2)
20 and performed acts of unprofessional conduct by repeatedly allowing checks to be drawn,
21 on at least nineteen (19) occasions, from the Operating Account for Cielo Vista with the
22 signature of Vintage Group’s Operations Manager/Director of Operations, who was neither
23 a duly elected board member, nor an officer, of Cielo Vista.

24 3. RESPONDENT violated NRS 116A.630(1)(b) pursuant to NAC 116A.355 by
25 failing to exercise ordinary and reasonable care in the performance of her duties when
26 RESPONDENT repeatedly allowed checks to be drawn, on at least twelve (12) occasions,
27 from the Operating Account for Majestic Point with the signature of Vintage Group’s
28 Operations Manager/Director of Operations, who was neither a duly elected board

1 member, nor an officer of Majestic Point.

2 4. RESPONDENT violated NRS 116.31153 pursuant to NAC 116A.355(2) and
3 performed acts of unprofessional conduct by repeatedly allowing checks to be drawn, on at
4 least twelve (12) occasions, from the Operating Account for Majestic Point with the
5 signature of Vintage Group's Operations Manager/Director of Operations, who was neither
6 a duly elected board member, nor an officer, of Majestic Point.

7 **DISCIPLINE AUTHORIZED**

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

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

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

26 **NOTICE OF HEARING**

27 **PLEASE TAKE NOTICE** that a disciplinary hearing has been set to consider this
28 Administrative Complaint against the above-named RESPONDENT in accordance with

1 Chapters 233B and 116 and 116A of the Nevada Revised Statutes and Chapter 116 and
2 116A of the Nevada Administrative Code.

3 **THE HEARING WILL TAKE PLACE** at the Commission meeting(s) scheduled
4 for December 9-11, 2025, beginning at approximately 9:00 a.m. each day, or until such
5 time as the Commission concludes its business. The Commission meeting will be held at
6 the Nevada State Business Center, 3300 W. Sahara Avenue, 4th Floor, Nevada Room, Las
7 Vegas, Nevada 89102 on December 9-10, 2025, with videoconferencing to Department of
8 Business & Industry, Division of Insurance, 1818 . College Parkway, Suite 103, Carson
9 City, Nevada 89706. The Commission meeting will be held at the Nevada State Business
10 Center, 3300 W. Sahara Avenue, 4th Floor, Tahoe Room, Las Vegas, Nevada 89102 on
11 December 11, 2025, with videoconferencing to Department of Business and Industry,
12 Division of Insurance, 1818 College Parkway, Suite 103, Carson City, Nevada 89706.

13 **STACKED CALENDAR: Your hearing is one of several hearings that may**
14 **be scheduled at the same time as part of a regular meeting of the Commission**
15 **that is expected to take place on December 9-11, 2025. Thus, your hearing may**
16 **be continued until later in the day or from day to day. It is your responsibility**
17 **to be present when your case is called. If you are not present when your hearing**
18 **is called, a default may be entered against you and the Commission may decide**
19 **the case as if all allegations in the complaint were true. If you need to negotiate**
20 **a more specific time for your hearing in advance because of coordination with**
21 **an out-of-state witness or the like, please call Maria Gallo, Commission**
22 **Coordinator, at (702) 486-4074.**

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

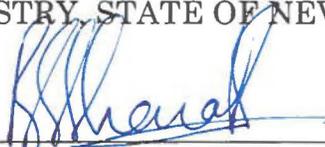
1 right to appear and be heard in your defense, either personally or through your counsel of
2 choice. At the hearing, the Division has the burden of proving the allegations in the
3 complaint and will call witnesses and present evidence against you. You have the right to
4 respond and to present relevant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

7 You have the right to request that the Commission issue subpoenas to compel
8 witnesses to testify and/or evidence to be offered on your behalf. In making this request,
9 you may be required to demonstrate the relevance of the witness' testimony and/or
10 evidence. Other important rights and obligations, including your obligation to answer the
11 complaint, you have are listed in NRS Chapter 116 and NAC Chapter 116, including
12 without limitation, NRS 116.770 through 116.780, and NAC 116.500 through NAC
13 116.635 and NRS Chapter 233B.

14 Note that under NAC 116.575, not less than five (5) working days before a hearing,
15 RESPONDENT must provide to the Division a copy of all reasonably available documents
16 that are reasonably anticipated to be used to support his position, and a list of witnesses
17 RESPONDENT intend to call at the time of the hearing. Failure to provide any document
18 or to list a witness may result in the document or witness being excluded from
19 RESPONDENT'S defense. The purpose of the hearing is to determine if the
20 RESPONDENT has violated the provisions of NRS 116, and to determine what
21 administrative penalty is to be assessed against RESPONDENT.

22
23 DATED this 4th day of November, 2025.

24 REAL ESTATE DIVISION,
25 DEPARTMENT OF BUSINESS &
26 INDUSTRY, STATE OF NEVADA

27 By: 
28 SHARATH CHANDRA, Administrator
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