

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 No. 2025-811

FILED

FEB 06 2026

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 **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 Juniper Trails Community Association (“Juniper Trails”).
10 [CICCH0005-0006; CICCH0013-0014]

11 4. Investigation Case No. 2025-811 was initiated by the Division’s compliance
12 division based on Association check No. 100030, dated 4/23/25, which appears to have been
13 signed by an individual who was neither a Nevada certified community manager, a duly
14 elected board member, nor an officer of the Association. [CICCH0004]

15 5. On October 9, 2025, the Division issued a Request for Information (RFI) letter
16 regarding the allegation that RESPONDENT allowed an individual who was neither a
17 Nevada certified community manager, a duly elected board member, nor an officer of the
18 Association to sign checks on behalf of Juniper Trails, including, but not limited to,
19 Association check No. 100030, dated 4/23/25. [CICCH0007-0011]

20 6. On October 17, 2025, RESPONDENT provided her response, including
21 documents requested in the RFI, and stating that Vintage “strive[s] to comply with all
22 NRS statues and guidelines. We apologize for any failures and have implemented a change
23 in policies and procedures internally to prevent any errors in the future.” [CICCH0012;
24 0013-0054].

25 7. Among the documents provided by RESPONDENT are copies of thirty-nine
26 (39) checks dated from 1/09/25 to 08/13/25, that were auto-signed in similar fashion to
27 Association check No. 100030. [CICCH0016-0054].

28 8. On November 12, 2025, the Division sent RESPONDENT an NRS 233B letter

1 indicating that through its investigation it obtained sufficient evidence to commence
2 disciplinary action by filing a complaint for disciplinary action before the Commission.
3 [CICCH0055-0056].

4 **VIOLATIONS OF LAW**

5 1. RESPONDENT violated NRS 116.31153 pursuant to NAC 116A.355(1)(a) by
6 engaging in unprofessional and/or negligent conduct when she repeatedly allowing checks
7 to be drawn from the Operating Account for Juniper Trails with the signature of Vintage
8 Group's Operations Manager, who was neither a duly elected board member, nor an officer
9 of Juniper Trails.

10 2. RESPONDENT violated NRS 116A.630(1)(b) pursuant to NAC
11 116A.355(1)(a) by engaging in unprofessional and/or negligent conduct by failing to
12 exercise ordinary and reasonable care in the performance of her duties when
13 RESPONDENT repeatedly allowed checks to be drawn from the Operating Account for
14 Juniper Trails with the signature of Vintage Group's Operations Manager, who was
15 neither a duly elected board member, nor an officer of Juniper Trails.

16 **DISCIPLINE AUTHORIZED**

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

- 20 1. Revoke or suspend the certificate;
- 21 2. Refuse to renew or reinstate the certificate;
- 22 3. Place the community manager on probation;
- 23 4. Issue a reprimand or censure to the community manager;
- 24 5. Impose a fine of not more than \$5,000 for each violation of a statute or
25 regulation;
- 26 6. Require the community manager to pay restitution;
- 27 7. Require the community manager to pay the costs of the investigation and
28 hearing;

1 an open meeting under Nevada's open meeting law and may be attended by the public.
2 After the evidence and arguments, the commission may conduct a closed meeting to
3 discuss your alleged misconduct or professional competence. You are entitled to a copy of
4 the transcript of the open and closed portions of the meeting, although you must pay for
5 the transcription. As a RESPONDENT, you are specifically informed that you have the
6 right to appear and be heard in your defense, either personally or through your counsel of
7 choice. At the hearing, the Division has the burden of proving the allegations in the
8 complaint and will call witnesses and present evidence against you. You have the right to
9 respond and to present relevant evidence and argument on all issues involved. You have
10 the right to call and examine witnesses, introduce exhibits, and cross-examine opposing
11 witnesses on any matter relevant to the issues involved.

12 You have the right to request that the Commission issue subpoenas to compel
13 witnesses to testify and/or evidence to be offered on your behalf. In making this request,
14 you may be required to demonstrate the relevance of the witness' testimony and/or
15 evidence. Other important rights and obligations, including your obligation to answer the
16 complaint, you have are listed in NRS Chapter 116 and NAC Chapter 116, including
17 without limitation, NRS 116.770 through 116.780, and NAC 116.500 through NAC
18 116.635 and NRS Chapter 233B.

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

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1 administrative penalty is to be assessed against RESPONDENT.

2 DATED this 5th day of February, 2026.

3 REAL ESTATE DIVISION,
4 DEPARTMENT OF BUSINESS &
5 INDUSTRY, STATE OF NEVADA

6 By: 
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