

1 **BEFORE THE COMMISSION OF APPRAISERS OF REAL ESTATE**
2 **STATE OF NEVADA**

3 SHARATH CHANDRA, Administrator,
4 REAL ESTATE DIVISION,
5 DEPARTMENT OF BUSINESS AND
6 INDUSTRY, STATE OF NEVADA,

7 Petitioner,

8 vs.

9 THOMAS A. WEISS
10 (License No. A.0007756-CR),

11 Respondent.

Case No. 2024-473

FILED

JUN 12 2026

NEVADA COMMISSION OF APPRAISERS

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12 **COMPLAINT AND NOTICE OF HEARING**

13 State of Nevada, Department of Business and Industry, Real Estate Division ("the
14 Division"), by and through counsel, Attorney General AARON D. FORD and Deputy
15 Attorney General WILLIAM C. PEPER, hereby notifies THOMAS A. WEISS
16 ("Respondent") of an administrative complaint and hearing which is to be held pursuant
17 to Chapter 233B and Chapter 645C of the Nevada Revised Statutes ("NRS") and Chapter
18 645C of the Nevada Administrative Code ("NAC"). The purpose of the hearing is to
19 consider the allegations stated below and to determine if the Respondent should be
20 subject to a disciplinary penalty as set forth in NRS 645C and/or NAC 645C, if the stated
21 allegations are proven at the hearing by the evidence presented.

22 **JURISDICTION**

23 At all times relevant to this Complaint, the Respondent was a Certified Residential
24 Appraiser licensed by the Division, and therefore, is subject to the Jurisdiction of the
25 Division and the provisions of NRS and NAC Chapter 645C. By availing himself of the
26 benefits and protections of the laws of the State of Nevada, the Respondent has submitted
27 to the jurisdiction of the Division.

28 **PROCEDURAL HISTORY**

1. On or about May 29, 2024, the Division received a complaint/statement of

1 fact from Complainant Zachary Jacob McPherson, asserting that Respondent Thomas A.
2 Weiss incompetently completed a series of three appraisal reports on Complainant's real
3 property, reflecting significant valuation swings and ultimately resulting in the loss of
4 confidence in the various appraisal reports by Complainant's purchaser and the
5 subsequent cancellation of a pending sales transaction. ("Statement of Fact and
6 Complaint"). Respondent prepared a total of three successive appraisal reports, all dated
7 March 12, 2024, on the property commonly known as 610 Bulette Drive, Carson City,
8 Nevada 89703 ("Subject Property" or "Property"). The primary focus of this Complaint
9 and Notice of Hearing will be on Respondent's third and final appraisal report.
10 ("Appraisal Report") 000097 – 000139, 000140 – 000183, 000184 – 000227 and 000228 -
11 000272.

12 2. Upon review of the Statement of Fact and Complaint, the Division on June
13 17, 2024, issued a formal request for Respondent's workfile, which Respondent delivered,
14 via email, to the Division on June 25, 2024. 000273 – 000296.

15 3. The Division, after noting evidence of several significant USPAP violations,
16 subsequently commissioned a Standard 3 Appraisal Review, by a licensed residential
17 appraiser authorized to prepare and complete a Standard 3 Compliance Review Report
18 ("Compliance Review Report"), for the purpose of determining whether Respondent
19 committed USPAP violations in connection with Respondent's work on Respondent's
20 Appraisal Report, which was completed on January 26, 2026, and then returned to the
21 Division. 000298 – 000320.

22 4. The Compliance Review Report described several USPAP violations and
23 other discrepancies. 000298 – 000320.

24 5. The Division noted that Respondent has had prior proceedings before this
25 commission, including Case No. 2020-406, which closed with a stipulation with the
26 Appraisal Advisory Review Committee for an agreement by Respondent to complete 22
27 hours of continuing education.

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FACTUAL ALLEGATIONS

1. On or about March 8, 2024, Fannie Mae randomly assigned to Respondent the responsibility to complete a FNMA URAR appraisal report, on Form 1004, for Movement Mortgage, for the Subject Property, a single-family residence, located in Carson City, Nevada, in connection with a purchase money loan as part of a contract for the sale of the Property for \$750,000.00. The buyer sought a Fannie Mae approved mortgage and therefore required a Fannie Mae-compliant appraisal report. 000273.

2. The Subject Property consists of a three-bedroom, two-bath, ranch-style home, approximately 2,160 square feet, three-car attached garage, on an approximately a quarter acre lot, built in 1977, but with recent remodeling in the kitchen and the two bathrooms. 000228 - 000230.

3. Respondent's first appraisal ("1st Report") referenced three comparable sales and two comparable listings, and utilized for its sales approach analysis the following properties: (1) 2175 St. George Way, Carson City, consisting of a 2,174 square foot ranch-style home, with three bedrooms and two bathrooms, and a three car garage; (2) 556 Oxford Street, Carson City, also consisting of 2,174 square feet, in a ranch-style home, with three bedrooms and two bathrooms, and a three car garage; and (3) 8 Comstock Circle, Carson City, consisting of a 2,513 square feet, four bedrooms, and 2.1 bathrooms, and 2,513 square feet. At the time of the appraisal, the respective ages of these comparables were 28, 24 and 48 years of age. 000097 - 000139.

4. Respondent coordinated a site visit but did not visit the Subject Property and instead arranged the visit with an appraiser intern, Nathaniel Finley (A.0208266-INTR), who examined the Subject Property on or about March 12, 2024. 000264.

5. Respondent completed an appraisal report (1st Report) and delivered it to the buyer's lender. The report relied on a sales comparison approach and concluded with a valuation of \$756,600.00 ("1st Report"). 000097 - 000139.

6. This 1st Report, however, triggered a Fannie Mae audit ("Fannie Mae Audit"), due to valuation irregularities arising in connection with Respondent's

1 calculations, and analysis, including Respondent's highest weight given to the second and
2 third comparables, while excluding the first comparable, despite that no adjustments
3 were calculated for the first two comparables but substantial adjustments were made for
4 the third comparable. 000004 – 000007.

5 7. In particular, the Fannie Mae Audit requested clarification from Respondent
6 on the use of selected comparables, weight given to one but not other more compatible
7 comparables, as well as to the ultimate appraisal value given. 000004 - 000007.

8 8. Respondent subsequently revised the 1st Report and provided a new value of
9 \$712,500, with strong weight given to the second comparable, but without referencing the
10 equally similar first comparable. 000140 - 000183.

11 9. This new appraisal report ("2nd Report"), having dropped the price by over
12 \$44,000, caused, not surprisingly, a lack of faith in the appraisal process from the parties
13 to the transaction, as well as the real estate agents and the lender. 000002 - 000007.

14 10. In response to the seller's request for an appeal, Respondent revised the 2nd
15 Report, and created a new, third appraisal report ("Final Report"), whereby the valuation
16 change stemmed primarily from Respondent's major adjustments related to the
17 downgrading of the conditions of comparables 1 and 2 from "C3" to "C4," thereby
18 justifying an increase in the Subject Property's valuation from \$712,500 to \$748,100.
19 000184 – 000227; 000228 - 000272.

20 11. The up, and then down, and now up again pattern while also creating
21 significant valuation swings for the Property caused confusion and uncertainty with the
22 parties to the transaction and, not unexpectedly, the buyer canceled the sale. 000002 –
23 000007.

24 12. Respondent's 1st Report gave most weight to comparables 2 and 3.
25 Respondent, however, inexplicably omitted giving more weight to comparable 1, which
26 had zero adjustments, and instead included comparable 3, which had multiple
27 adjustments. These were the anomalies that triggered the initial Fannie Mae audit, but
28 there were other, rather patent, USPAP violations and inconsistencies not called out by

1 that review. 000097 – 000139.

2 13. In his Final Report, Respondent committed various errors and made illogical
3 conclusions, including violations of USPAP Ethics Rules and USPAP Competency Rules,
4 as well as violations of USPAP standards Rule 2-1(b); 2-1(c); 2-2(a)(x); 2-2(a)(xii); and 2-
5 2(a)(xiii), as further described herein. 000298 – 000320.

6 14. Respondent's Appraisal Report for the Subject Property contained the
7 comment, on page two of the Comment Addendum, as follows: "The appraiser
8 (Respondent) has made no attempt to make discovery of neighborhood influences such as,
9 but not limited to, illicit activity or interim rehabilitation facilities/half-way houses and
10 that the client may desire to check this information for themselves." The comment
11 suggests an improper pretextual inference that the Subject Property is located in a
12 location with respect to protected characteristics of certain persons or groups of people
13 who may be associated with the Subject Property and suggests improper bias, in violation
14 of Advisory Opinion No. 40. 000234.

15 15. Respondent's Appraisal Report showed that HOA fees were payable each
16 month, but did not check the PUD checkbox, in the Subject section. Furthermore,
17 Respondent described the subject property as located in the "Mark Twain Subdivision,"
18 but the PUD Information section indicated that the subject property was an "Attached"
19 dwelling located in the "Spring Meadows" project and at the same time, the *Improvements*
20 section showed that the dwelling was "Detached." 000229; 000231.

21 16. Respondent's Appraisal Report's Site Description section stated that the
22 Specific Zoning Classification was SF6, and Single Family Residential. However, the
23 Zoning Compliance section is marked as "Legal Non-Conforming (Grandfathered Use),"
24 and yet no further explanation is provided as to why the subject property is a
25 nonconforming use to the SF6 zone, which is described as being single-family residential.
26 000229; 000231; 000234.

27 17. Respondent's Appraisal Report further described that "The Cost Approach
28 can be supportive but is less reliable and not used in this report to develop replacement

1 cost new, economic life and depreciation,” and yet Respondent completed a cost approach
2 and provided a value indication of \$761,034.00, with no further explanation or discussion.
3 000230 – 000231.

4 18. The Appraisal Report further stated on the first page of the Comment
5 Addendum, that “The three sales and two listings are all situated in the same Carson
6 City market area and feature similar designs, quality characteristics and ages. However,
7 Comps 1 & 2 received no adjustment.” And yet, to the contrary, comparable sales 1 and 2
8 did receive condition adjustments, as shown in the 3rd Report. Finally, Respondent stated
9 that “Most weight in the final consideration of value is given to Comp 2 as it is the most
10 similar bracketed sale being similar functional utility” and yet Comparable Sale No. 1
11 was the most recent sale and, along with Comparable Sale No. 2, had the fewest and
12 lowest gross percentage adjustments and, consequently, Respondent’s reconciliation of the
13 sales comparison approach lacks credibility without further explanation. 000230; 000232
14 – 000233.

15 19. Respondent’s Appraisal Report failed to indicate which hypothetical
16 assumptions (i.e. conditions) were relied upon, or how their use may have affected the
17 assignment results, when Respondent, on the third page of the Comment Addendum of
18 the Report stated “(All Hypothetical Assumptions made in this report are made in
19 accordance with USPAP Standard 2-2. Any hypothetical assumptions made may impact
20 assignment results).” 000235.

21 20. Respondent’s Appraisal Report stated on the first page of the Comment
22 Addendum that “The three sales and two listings are all situated in the same Carson City
23 market area and feature similar designs, quality characteristics and ages. However,
24 Comps 1 & 2 received no adjustment.” And yet, to the contrary, comparable sales 1 and 2
25 did receive condition adjustments, as shown in the 3rd Report. Finally, Respondent stated
26 that “Most weight in the final consideration of value is given to Comp 2 as it is the most
27 similar bracketed sale being similar functional utility” and yet Comparable Sale No. 1
28 was the most recent sale and, along with Comparable Sale No. 2, had the fewest and

lowest gross percentage adjustments and, consequently, Respondent's reconciliation of the sales comparison approach lacks credibility without further explanation. 000232 – 000233.

21. Respondent's Appraisal Report included a response of "Yes" to the question "Is the highest and best use of the subject property as improved the highest and best use?" However, Respondent failed to summarize the support and rationale for this option, and the failure to do so was relevant given the indication that the property represented a "Legal Nonconforming" use. 000229.

22. Respondent's Appraisal Report stated, in the Improvements section of the Report, that "An extraordinary assumption was made that there are no hidden deficiencies nor adverse conditions," except, however, Respondent failed to further explain how the extraordinary assumptions could have affected assignment results, and what effects might have occurred under those extraordinary assumptions. 000229.

23. On April 13, 2026, Division Appraisal Investigator James Silva sent Respondent an NRS 233B letter, via certified mail, indicating that the Division has obtained sufficient information to commence disciplinary action against him and intended to do so by filing a formal complaint with the Commission of Appraisers of Real Estate. 000321 – 000322.

VIOLATIONS OF LAW

Respondent failed to prepare the Subject Appraisal Report for the Subject Property in compliance with the Standards of the Appraisal Foundation and the law. The Standards are published in the Uniform Standards of Professional Appraisal Practice ("USPAP") adopted by the Appraisal Standards Board of the Appraisal Foundation, as authorized by Congress, and adopted in Nevada by NAC 645C.400(1).

First Violation

The USPAP Ethics Rules require that an appraiser must not conceal the use of or reliance upon any of the personal characteristics described in the Ethics Rules by

1 pretextually referring to some other characteristic as though that other characteristic was
2 the reason for the appraiser's opinions or conclusions. Further, misrepresentation of the
3 appraiser's reasoning is misleading, in further violation of USPAP's Standards Rules, and
4 concealment by using a pretext in this way is also a violation of the Ethics Rules.

5 Respondent violated the USPAP Ethics Rules, as codified in NAC 645C.405(1) by
6 referencing in Respondent's Appraisal Report, that "...the client may desire to check this
7 information for themselves...", which is, under the Rules, inappropriate and, in
8 combination with other factors, could result in an indication of bias.

9 Respondent's actions constitute unprofessional conduct pursuant to NRS
10 645C.470(2), as determined by NAC 645C.405(1) and, therefore, grounds for disciplinary
11 action pursuant to NRS 645C.460(1)(a) and/or (b).

12 **Second Violation**

13 The USPAP Competency Rules require that an appraiser must perform the
14 appraiser's appraisal reports in a careful and non-negligent manner.

15 Respondent violated the USPAP Competency Rules by performing the Appraisal
16 Report in a careless and negligent manner, as shown by repeated errors and inherent
17 inconsistencies in the Appraisal Report.

18 Respondent's actions constitute unprofessional conduct pursuant to NRS
19 645C.470(2), as determined by NAC 645C.405(1) and, therefore, grounds for disciplinary
20 action pursuant to NRS 645C.460(1)(a) and/or (b).

21 **Third Violation**

22 USPAP Standards Rule 2-1(b) requires an appraiser to prepare an appraisal report
23 that contains sufficient information to enable the intended user(s) of the appraisal to
24 understand the report properly.

25 Respondent violated Standards Rule 2-1(b) where Respondent showed that HOA
26 fees were payable each month, but did not check the PUD checkbox, in the Subject
27 section. Furthermore, Respondent described the subject property as located in the "Mark
28 Twain Subdivision," but the PUD Information section indicated that the subject property

1 was an "Attached" dwelling located in the "Spring Meadows" project and yet the
2 Improvements section showed that the dwelling was "Detached."

3 Respondent further violated Standards Rule 2-1(b) by stating in the Site
4 Description section that the Specific Zoning Classification was SF6, and Single Family
5 Residential. However, the Zoning Compliance section is marked as "Legal Non-
6 Conforming (Grandfathered Use)," and yet no further explanation is provided as to why
7 the subject property is a nonconforming use to the SF6 zone, which is described as being
8 single-family residential.

9 Respondent further violated Standards Rule 2-1(b) by stating in the cost approach
10 section of the Report that "The Cost Approach can be supportive, but is less reliable and
11 not used in this report to develop replacement cost new, economic life and depreciation";
12 and yet Respondent completed a cost approach and provided a value indication of
13 \$761,034.00, with no further explanation or discussion.

14 Respondent further violated Standards Rule 2-1(b) by stating in the Report on the
15 first page of the Comment Addendum, that "The three sales and two listings are all
16 situated in the same Carson City market area and feature similar designs, quality
17 characteristics and ages. However, Comps 1 & 2 received no adjustment." And yet, to the
18 contrary, comparable sales 1 and 2 did receive condition adjustments, as shown in the 3rd
19 Report. Finally, Respondent stated that "Most weight in the final consideration of value is
20 given to Comp 2 as it is the most similar bracketed sale being similar functional utility"
21 and yet Comparable Sale No. 1 was the most recent sale and, along with Comparable Sale
22 No. 2, had the fewest and lowest gross percentage adjustments and, consequently,
23 Respondent's reconciliation of the sales comparison approach lacks credibility without
24 further explanation.

25 The Respondent's actions constitute unprofessional conduct pursuant to NRS
26 645C.470(2), as determined by NAC 645C.405(1) and, therefore, grounds for disciplinary
27 action pursuant to NRS 645C.460(1)(a) and/or (b).

28 **Fourth Violation**

1 USPAP Standards Rule 2-1(c) requires an appraiser to clearly and accurately
2 disclose all assumptions, extraordinary assumptions, hypothetical conditions, and
3 limiting conditions used in the assignment.

4 Respondent violated Standards Rule 2-1(c) by failing to indicate which hypothetical
5 assumptions (i.e. conditions) were relied upon, or how their use may have affected the
6 assignment results, when Respondent, on the third page of the Comment Addendum of
7 the Report stated “(All Hypothetical Assumptions made in this report are made in
8 accordance with USPAP Standard 2-2. Any hypothetical assumptions made may impact
9 assignment results).”

10 Respondent’s actions constitute unprofessional conduct pursuant to NRS
11 645C.470(2), as determined by NAC 645C.405(1) and, therefore, grounds for disciplinary
12 action pursuant to NRS 645C.460(1)(a) and/or (b).

13 **Fifth Violation**

14 USPAP Standards Rule 2-2(a)(x) requires an appraiser to provide sufficient
15 information in the appraisal report to indicate that the appraiser complied with the
16 requirements of USPAP Standard 1 by: (1) summarizing the appraisal methods and
17 techniques employed; (2) stating the reasons for excluding the sales comparison, cost, or
18 income approach(es) if any have not been developed; (3) summarizing the results of
19 analyzing the subject sales and other transfers, agreements of sale, options, and listings
20 in accordance with Standards Rule 1-5; (4) stating the value opinion(s) and conclusions(s);
21 and (5) summarizing the information analyzed and the reasoning that supports the
22 analyses, opinions, and conclusions, including reconciliation of the data and approaches.
23 Respondent violated Standards Rule 2-2(a)(x) by (1) stating in the Report on the first page
24 of the Comment Addendum that “The three sales and two listings are all situated in the
25 same Carson City market area and feature similar designs, quality characteristics and
26 ages. However, Comps 1 & 2 received no adjustment.” And yet, to the contrary,
27 comparable sales 1 and 2 did receive condition adjustments, as shown in the 3rd Report.
28 Finally, Respondent stated that “Most weight in the final consideration of value is given

1 to Comp 2 as it is the most similar bracketed sale being similar functional utility” and yet
2 Comparable Sale No. 1 was the most recent sale and, along with Comparable Sale No. 2,
3 had the fewest and lowest gross percentage adjustments and, consequently, Respondent’s
4 reconciliation of the sales comparison approach lacks credibility without further
5 explanation.

6 Respondent’s actions constitute unprofessional conduct pursuant to NRS
7 645C.470(2), as determined by NAC 645C.405(1) and, therefore, grounds for disciplinary
8 action pursuant to NRS 645C.460(1)(a) and/or (b).

9 **Sixth Violation**

10 USPAP Standards Rule 2-2(a)(xii) requires an appraiser to address when an
11 opinion of highest and best use was developed by the appraiser to state that opinion and
12 summarize the support and rationale for that opinion.

13 Respondent violated Standards Rule 2-2-(a)(xii) by checking “Yes” to the question
14 “Is the highest and best use of the subject property as improved the highest and best
15 use?” Respondent failed to summarize the support and rationale for this option, and the
16 failure to do so was particularly important given the indication that the property
17 represented a “Legal Nonconforming” use.

18 Respondent’s actions constitute unprofessional conduct pursuant to NRS
19 645C.470(2), as determined by NAC 645C.405(1) and, therefore, grounds for disciplinary
20 action pursuant to NRS 645C.460(1)(a) and/or (b).

21 **Seventh Violation**

22 USPAP Standards Rule 2-2(a)(xiii) requires an appraiser to clearly and
23 conspicuously state all extraordinary assumptions and hypothetical conditions and state
24 that their use might have affected the assignment results.

25 Respondent violated Standards Rule 2-2-(a)(xiii) by stating, in the Improvements
26 section of the Report, that “An extraordinary assumption was made that there are no
27 hidden deficiencies nor adverse conditions,” but yet Respondent failed to explain or state
28 how those extraordinary assumptions could have affected assignment results, and what

1 effects might have occurred under those extraordinary assumptions.

2 Respondent's actions constitute unprofessional conduct pursuant to NRS
3 645C.470(2), as determined by NAC 645C.405(1) and, therefore, grounds for disciplinary
4 action pursuant to NRS 645C.460(1)(a) and/or (b).

5 **DISCIPLINE AUTHORIZED**

6 1. Pursuant to NRS 645C.460(2), if grounds for disciplinary action against an
7 appraiser are found to exist for unprofessional conduct, the Commission may revoke or
8 suspend the certificate, place conditions upon the certificate, deny the renewal of his
9 certificate, and/or impose a fine up to \$10,000.00 per violation.

10 3. Additionally, under NRS 622.400, the Commission is authorized to impose the
11 costs of the proceedings upon the Respondent, including investigative costs and attorney's
12 fees, if the Commission otherwise imposes discipline on the Respondent.

13 4. Therefore, the Division requests the Commission to impose such discipline as
14 it determines is appropriate under the circumstances and to award the Division its costs
15 and attorney's fees for this proceeding.

16 **PLEASE TAKE NOTICE** that a disciplinary hearing has been set to consider this
17 Administrative Complaint against the above-named Respondent in accordance with
18 Chapter 233B and Chapter 645C of the Nevada Revised Statutes and Chapter 645C of the
19 Nevada Administrative Code.

20 **THE HEARING WILL TAKE PLACE** at the Commission meeting scheduled
21 for July 14-16, 2026, beginning at approximately 9:00 a.m. each day, or until such
22 time as the Commission concludes its business. The Commission meeting will
23 be held at the Nevada State Business Center, 3300 W. Sahara Avenue, Nevada
24 Room 4th Floor, Las Vegas, Nevada 89102, with video conference to: Department
25 of Business and Industry, 1818 College Parkway, Suite 103, Carson City, Nevada
26 89706.

27 **STACKED CALENDAR:** Your hearing is one of several hearings that may
28 be scheduled at the same time as part of a regular meeting of the Commission

1 that is expected to take place on July 14-16, 2026. Thus, your hearing may be
2 continued until later in the day or from day to day. It is your responsibility to
3 be present when your case is called. If you are not present when your case is
4 called, a default may be entered against you, and the Commission may decide
5 the case as if all allegations in the complaint were true. If you need to negotiate
6 a more specific time for your hearing in advance, because of coordination with
7 out-of-state witnesses or the like, please call Maria Gallo, Commission
8 Coordinator, at (702) 486-4074.

9 YOUR RIGHTS AT THE HEARING: Except as mentioned below, the hearing is an
10 open meeting under Nevada's Open Meeting Law (OML) and may be attended by the
11 public. After the evidence and arguments, the Commission may conduct a closed meeting
12 to discuss your alleged misconduct or professional competence. You are entitled to a copy
13 of the transcript of the open and closed portions of the meeting, although you must pay for
14 the transcription.

15 As the Respondent, you are specifically informed that you have the right to appear
16 and be heard in your defense, either personally or through your counsel of choice. At the
17 hearing, the Division has the burden of proving the allegations in the complaint and will
18 call witnesses and present evidence against you. You have the right to respond and to
19 present relevant evidence and argument on all issues involved. You have the right to call
20 and examine witnesses, introduce exhibits, and cross-examine opposing witnesses on any
21 matter relevant to the issues involved.

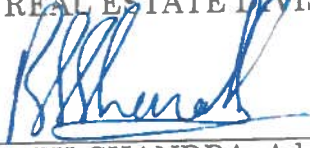
22 You have the right to request that the Commission issue subpoenas to compel
23 witnesses to testify and/or evidence to be offered on your behalf. In making this request,
24 you may be required to demonstrate the relevance of the witnesses' testimony and/or
25 evidence. Other important rights you have are listed in NRS Chapter 645C, NRS
26 Chapter 233B, and NAC Chapter 645C.

27 DATED the 12th day of June, 2026.

DATED the 12th day of June, 2026.

1 NEVADA REAL ESTATE DIVISION

AARON D. FORD
Attorney General

2
3 By: 
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