

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

SHARATH CHANDRA, Administrator,  
REAL ESTATE DIVISION, DEPARTMENT  
OF BUSINESS & INDUSTRY,  
STATE OF NEVADA,

Petitioner,

vs.

JARED DAVIS,  
(UNLICENSED),

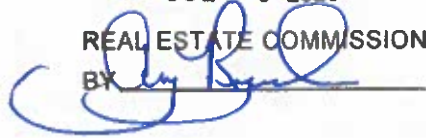
Respondent.

Case No. 2024-795

**FILED**

JUL 09 2026

REAL ESTATE COMMISSION

BY 

**COMPLAINT AND NOTICE OF HEARING**

The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY OF THE STATE OF NEVADA ("Division") hereby notifies RESPONDENT JARED DAVIS ("RESPONDENT" or "RESPONDENT DAVIS") of an administrative hearing before the STATE OF NEVADA REAL ESTATE COMMISSION ("Commission"). The hearing will be held pursuant to Chapter 233B and Chapter 645 of the Nevada Revised Statutes ("NRS"), and Chapter 645 of the Nevada Administrative Code ("NAC"). The purpose of the hearing is to consider the allegations stated below and to determine if the RESPONDENT should be subject to an administrative penalty as set forth in NRS 645.235 and/or NRS 622.400, and the discipline to be imposed, if violations of law are proven.

**JURISDICTION**

RESPONDENT, at all relevant times pertinent to the violations in this Complaint, acted as a broker as defined in NRS 645.030 and/or as a salesperson as defined in NRS 645.040 without the requisite license and is therefore subject to the jurisdiction of the Division and the Commission, and the provisions of NRS chapter 645 and NAC chapter 645.

**FACTUAL ALLEGATIONS**

1. At all times relevant to this Complaint, RESPONDENT JARED DAVIS has never been licensed with the Nevada Real Estate Division. [NRED0152-0154].
2. Instead, RESPONDENT DAVIS is an Arizona real estate licensee and has been employed with SRS Real Estate Partners, LLC. [NRED0155-0162].

1           3.       At all times relevant to this Complaint, Patrick Luther (“Luther”)<sup>1</sup> was a licensed Nevada  
2 salesperson (S.0169792) affiliated with SRS Real Estate Partners, LLC. [NRED0168-0170; 0202].

3           4.       At all times relevant to this Complaint, Tammy Lord (“Lord”) was a licensed Nevada  
4 broker (B.1001815.LLC) affiliated with SRS Real Estate Partners, LLC. [NRED0202; 0222].

5           5.       On August 27, 2024, the Division received two (2) separate Statements of Fact from  
6 COMPLAINANTS Catherine Cheng-Orban and John Mitteness against RESPONDENT Davis.  
7 [NRED0001-0150].

8           6.       COMPLAINANT Cheng-Orban alleges, generally, that RESPONDENT Davis received  
9 commissions for two property transactions, that should have been paid to other agents, instead:

- 10           a.       the sale of her property at 3900 Meadows Ln., Las Vegas, NV 89107, (“3900 Meadows  
11 Ln.” or “SafeNest”) which she was selling to her tenant, SafeNest, a non-profit domestic  
12 violence shelter, the 2% buyer commission for which she should have been paid to Jarrad  
13 Katz, of MLD Group Brokerage; and  
14           b.       her purchase of a 7-Eleven property at Ann Road and N. 5<sup>th</sup> St., Las Vegas, NV 89031,  
15 (“7-Eleven”), in which she said her longtime broker agent, John Mitteness, should have  
16 been paid a 2% commission to represent her in the transaction, but was omitted from the  
17 commissions paid. [NRED0002-0004;0005-0063]

18           7.       COMPLAINANT Mitteness alleges that he has represented Cheng-Orban in real estate  
19 transactions for the past twelve years and actively represented her in negotiations for purchase of the 7-  
20 Eleven transaction, but when he inquired of his commission payment to the escrow officer, was told there  
21 were no designated funds available to pay his commission. [NRED0064-0066; 0018; 0169; 0202].

22           8.       COMPLAINANT Mitteness further noted that because the transaction was a time-  
23 sensitive 1031 exchange, he did not file a complaint with the Division regarding the non-payment at the  
24 time or otherwise delay the sale, to ensure Cheng-Orban’s purchase occurred within the necessary  
25 timeframe for the exchange. [NRED0066].

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27  
28 <sup>1</sup> Disciplinary cases have been contemporaneously filed against Mr. Luther and Ms. Lord in Case Nos.  
2024-796 and 2024-797.

1           9.       On September 5, 2024, the Division issued an open investigation letter to RESPONDENT  
2 DAVIS regarding the COMPLAINANTS' Statements of Fact and requesting his response via affidavit,  
3 as well as documentation and transaction files concerning the following properties, with a deadline of  
4 September 20, 2024:

5           a.   Don Tortaco: 360 E. Ann Rd. N. Las Vegas, 89031

6           b.   Take 5 Oil Change, 4320 N. Rancho Rd. Las Vegas, NV 89108

7           c.   7-Eleven Gas Convenience Store, NE Corner of Ann Rd and 5<sup>th</sup> St., N. Las Vegas, NV  
8           89031

9           d.   SafeNest, 3900 Meadows Ln, Las Vegas, 89104.

10          [NRED0163-0164].

11          10.     On October 5, 2024, the Division issued a second investigation letter to RESPONDENT,  
12 noting his failure to respond to its prior letter and requesting response by October 16, 2024. [NRED0165-  
13 0167].

14          11.     On October 11, 2024, Nevada Broker Tami Lord submitted her responsive affidavit in  
15 Case No. 2024-797, along with documents in her possession for the 7-Eleven, Don Tortaco, SafeNest,  
16 and Take 5 transactions. [NRED0228-0373].

17          12.     In her response, she noted that "[p]rior to receipt of Case No. 2024-797, [she] was unaware  
18 that there were commission/fee complaints or that Jared Davis was handling the transactions in Nevada."  
19 She noted that she had multiple conversations with Nevada Salesperson Patrick Luther regarding "the  
20 importance that only licensed brokers could transact deals in Nevada and it was [her] understanding that  
21 Patrick Luther was leading and handling this transaction." [NRED0228-0229].

22          13.     RESPONDENT LORD also noted, in her response, that Jared Davis evidently had  
23 engaged in communications in these transactions without her knowledge, and she sent him a letter to  
24 cease all activity and refer all transactions to a Nevada licensee. [NRED0228-0232].

25          14.     On October 14, 2024, RESPONDENT DAVIS submitted a responsive affidavit, stating  
26 that he and his brokerage firm entered into a co-marketing agreement with Cheng-Orban's Trust and, in  
27 co-operation with Mitteness and his agency, Wynn Realty group, marketed and sold the 3900 Meadows  
28 Ln. property. [NRED0226-0227].

15. RESPONDENT DAVIS further stated that “we entered into this agreement with Wynn Realty with the intention of representing Catherine Cheng-Orban on the buy side of future transactions” and that he “partnered” with Patrick Luther of SRS who is licensed in Nevada. [NRED0226-0227].

16. RESPONDENT also conceded that he should have taken a referral position and have let Mr. Luther handle the negotiations. [NRED0226-0227].

17. According to the broker revenue summary for “Don Tortaco- E. Ann Rd. and N. 5<sup>th</sup> Street,” RESPONDENT Davis was identified as the “Referring Broker” and assigned a 48.83% commission split of the \$79,960.00 earned on the transaction. [NRED00170; 0202].

18. According to the broker revenue summary for 3900 Meadows Ln (SafeNest), RESPONDENT Davis was identified as the “Referring Broker” and assigned a 71.25% commission split of the \$34,500.00 earned on the transaction. [NRED0222-0223].

19. According to the broker revenue summary for 4320 N. Rancho Drive (Take 5), RESPONDENT Davis was identified as the "Referring Broker" and assigned a 48.50% commission split of the \$50,000.00 earned on the transaction. [NRED0364-0337].

20. On March 18, 2025, the Division mailed an NRS 233B letter via certified mail to RESPONDENT, stating the Division's intent to file a complaint with the Commission for violations of NRS 645.230(1). [NRED0229-0231].

## VIOLATIONS OF LAW

**RESPONDENT** has committed the following violations of law:

1. RESPONDENT violated NRS 645.230(1)(a) by acting in the capacity of a real estate broker, as defined by NRS 645.030, when he performed activities constituting the representation of parties to a real estate transaction in Nevada for which a license is required under NRS 645, for the E. Ann Rd. and N. 5th Street (Don Tortaco) property.

2. RESPONDENT violated NRS 645.230(1)(a) by acting in the capacity of a real estate broker, as defined by NRS 645.030, when he performed activities constituting the representation of parties to a real estate transaction in Nevada for which a license is required under NRS 645, for the 3900 Meadows Ln. (SafeNest) property.

3. RESPONDENT violated NRS 645.230(1)(a) by acting in the capacity of a real estate broker, as defined by NRS 645.030, when he performed activities constituting the representation of parties to a real estate transaction in Nevada for which a license is required under NRS 645, for the 4320 N. Rancho Drive (Take 5) property.

4. RESPONDENT violated NRS 645.230(1)(a) by acting in the capacity of a real estate broker, as defined by NRS 645.030, when he performed activities constituting the representation of parties to a real estate transaction in Nevada for which a license is required under NRS 645, for the “E. Ann Rd. and N. 5<sup>th</sup> Street” (7-Eleven) property.

**DISCIPLINE AUTHORIZED**

Pursuant to NRS 645.235(2), the Commission is empowered to impose an administrative fine not to exceed the amount of any gain or economic benefit that the person derived from the violation or \$5,000, whichever amount is greater.

Additionally, under NRS Chapter 622, the Commission is authorized to impose costs of the proceeding upon RESPONDENT, including investigative costs and attorney's fees, if the Commission otherwise imposes discipline on RESPONDENT.

Therefore, the Division requests that the Commission take such disciplinary action as it deems appropriate under the circumstances.

## NOTICE OF HEARING

**PLEASE TAKE NOTICE**, that a disciplinary hearing has been set to consider the Administrative Complaint against the above-named Respondent in accordance with Chapters 233B and 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada Administrative Code. **THE HEARING WILL TAKE PLACE** on August 11, 2026, commencing at 9:00 a.m., or as soon thereafter as the Commission is able to hear the matter, and each day thereafter commencing at 9:00 a.m. through August 13, 2026, or earlier if the business of the Commission is concluded. The Commission meeting will be held on August 11, 2026, through August 13, 2026, at the Nevada Division of Insurance, 1818 College Parkway, Suite 103, Carson City, Nevada 89706 with video conferencing to the Nevada State Business Center, 3300 West Sahara Avenue, 4<sup>th</sup> Floor-Nevada

1 Room, Las Vegas, NV 89102.

2       **STACKED CALENDAR:** Your hearing is one of several hearings scheduled at the same  
3 time as part of a regular meeting of the Commission that is expected to last from August 11, 2026,  
4 through August 13, 2026, or earlier if the business of the Commission is concluded. Thus, your  
5 hearing may be continued until later in the day or from day to day. It is your responsibility to be  
6 present when your case is called. If you are not present when your hearing is called, a default may  
7 be entered against you and the Commission may decide the case as if all allegations in the complaint  
8 were true. If you have any questions, please call Amy Reveyard, Commission Coordinator, at  
9 (702) 486-4606.

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

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

21       You have the right to request that the Commission issue subpoenas to compel witnesses to  
22 testify and/or evidence to be offered on your behalf. In making the request, you may be required  
23 to demonstrate the relevance of the witness' testimony and/or evidence. Other important rights  
24 you have are listed in NRS 645.680 through 645.990, NRS Chapter 233B, and NAC 645.810 through  
25 645.875.

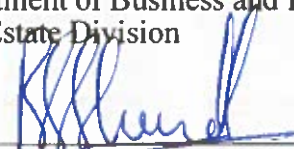
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1       The purpose of the hearing is to determine if the Respondent has violated NRS 645 and/or  
2 NAC 645 and if the allegations contained herein are substantially proven by the evidence  
3 presented and to further determine what administrative penalty is to be assessed against the  
4 RESPONDENT, if any, pursuant to NRS 645.235, 645.633 and or 645.630.

5       DATED the 9th day of July, 2026.

6                               State of Nevada  
7                               Department of Business and Industry  
8                               Real Estate Division

9       By:   
10           SHARATH CHANDRA, Administrator  
11           3300 West Sahara Avenue, Suite 350  
12           Las Vegas, Nevada 89102

13                           AARON D. FORD  
14                           Attorney General

15       By: /s/ Phil W. Su  
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