

JUL 06 2026

REAL ESTATE COMMISSION  
BY 

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Attorney for Respondent  
TOMMY DELOSREYES

**BEFORE THE REAL ESTATE COMMISSION**  
**STATE OF NEVADA**

SHARATH CHANDRA, Administrator, ) Case No.: 2025-373  
REAL ESTATE DIVISION, )  
DEPARTMENT OF BUSINESS & )  
INDUSTRY, STATE OF NEVADA )

Petitioner,  
vs.

TOMMY DELOSREYES,  
(S.0192508-Active)

Respondent.

**MOTION FOR REHEARING**  
**and**  
**REQUEST TO STAY IMPOSITION OF**  
**DISCIPLINARY ACTION**

Hearing Date: May 5, 2026  
Effective Order Date: July 22, 2026

COMES NOW Respondent, TOMMY DELOSREYES, ("Respondent"), by and through his attorney, KATHRYN HOLBERT, Esq., of NEVADA REAL ESTATE LAW, LLC, and, pursuant to NRS 233B.130(4) and NAC 645.820, specifically, NAC645.820(7)(b), hereby requests that the commission rehear the above referenced case, and stay imposition of the current order, until after the case is reheard, for the following reasons:

**A. INTRODUCTION**

The Commissions' decision to take the devastating disciplinary action of revoking the Respondent's real estate license was based at least in part on Respondent's failure to answer the complaint and/or attend the hearing. However, as set forth in the attached declaration of Respondent, Tommy DeLosReyes, Mr. DeLosReyes was unaware of either the complaint or the

1 hearing, until after the hearing had occurred. If he had known about the complaint he would  
2 have filed a response, which would have at the very least provided the commission with  
3 additional information for it to consider in making its decision, and if he had known about the  
4 hearing he would have attended and presented his side of the story, which may have resulted in  
5 the commission entering different disciplinary orders. Mr. DeLosReyes simply wants the  
6 opportunity to tell his side of the story and hopes that the Commission wants the opportunity to  
7 decide this matter based upon all available facts and testimony.  
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9 B. PROCEDURAL HISTORY and TIMELINE

10 The underlying complaint to the NRED was submitted by Teresa Perron, the niece of the  
11 Seller, Joseph Gouthro, whom Mr. DeLosReyes represented regarding the underlying  
12 transaction, on April 22, 2025. Mr. DeLosReyes was notified of Ms. Perron's complaint on  
13 May 30, 2025. The factual allegations in the NRED Complaint acknowledge that although Mr.  
14 DeLosReyes' responses to Ms. Perron's complaint were incomplete, he was responsive to the  
15 Complaint and was cooperative regarding the investigation. As set forth in the attached  
16 declaration, Mr. DeLosReyes regularly communicated with the NRED investigators who were  
17 assigned to the case regarding the status of the case. When Mr. DeLosReyes spoke with the  
18 investigator in March, 2026, after receiving the investigator's letter dated March 10, 2026, the  
19 investigator informed him that IF a formal complaint were filed, it likely would not be heard  
20 until November, 2026. However, the formal complaint was filed on April 3, 2026 and the  
21 hearing was set for May 5-7, 2026, barely a month after the complaint was filed.  
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23  
24 Mr. DeLosReyes was out of town from April 2<sup>nd</sup> through April 25<sup>th</sup>, 2026, helping a  
25 family member in Texas, so he was not at home to receive the certified letter with the Complaint  
26 and he did not receive a copy of the Complaint until after the hearing. Mr. DeLosReyes' broker,  
27 Spencer Waldren with EXP, was notified of the hearing and did send Mr. DeLosReyes an email.  
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1 However, that email went to Mr. DeLosReyes' junk mail box and Mr. DeLosReyes did not  
2 receive Mr. Waldren's email until after the hearing.

3 Mr. DeLosReyes learned about the Complaint and the hearing when he tried to login to  
4 the MLS system on the afternoon of May 5, 2026 and could not login. When he called the LVR  
5 to determine the cause of the problem, the LVR informed Mr. DeLosReyes that his broker had  
6 turned his license back over to the division. When Mr. DeLosReyes tried to call Mr. Waldren,  
7 he would not take his call, but had his assistant inform him that his license had been revoked at  
8 the NRED hearing held that morning. Mr. DeLosReyes was immediately responsive, called the  
9 NRED, obtained a copy of the Complaint, and asked about the rehearing process.  
10

11 In sum, Mr. DeLosReyes' behavior regarding this matter indicates that he would have  
12 been present on May 5, 2026 had he known about the hearing. Additionally, Mr. DeLosReyes's  
13 declaration is clear that he will be present at the hearing date if this Request for ReHearing is  
14 granted.  
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16 C. SUBSTANTIVE ARGUMENTS

17 Although this transaction and experience have already been a significant learning lesson  
18 for Mr. DeLosReyes and he does admit he made numerous, serious mistakes, he does dispute  
19 that he forged any invoices, submitted any false information to the NRED or that he retained  
20 any portion of the funds paid by Mr. Gouthro outside of the escrow regarding the subject  
21 transaction. Mr. DeLosReyes requests that this matter be reheard, not to make excuses for his  
22 behavior, but to provide additional context, witnesses and evidence regarding his behavior so  
23 that the commission may enter an Order based upon all available facts, witnesses and evidence.  
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1 D. REQUEST FOR STAY OF IMPOSITION

2 In the event that this Request for Rehearing is granted, Mr. DeLosReyes also requests  
3 that the Commission enter an Order Staying imposition of the Order entered on June 22, 2026,  
4 which is currently effective July 22, 2026, until after this matter can be reheard.

5 E. CONCLUSION

6 Mr. DeLosReyes' failed to attend the hearing held on May 5, 2026, because he did not  
7 know about it. He did not know about it because he was out of town helping a family member  
8 when the post office attempted to deliver the certified mail and because his broker's email went  
9 to junk mail. Additionally, Mr. DeLosReyes was not communicating with the division  
10 regarding this matter during April, 2026, because he was out of town and because he had been  
11 informed in March, 2026, that IF a complaint were filed, it likely wouldn't be heard until  
12 November of 2026.  
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15 None of the above is intended as an attempt excuse Mr. DeLosReyes' failure to attend  
16 the hearing, or to shift the blame for his failure to attend to anyone else, but merely to show that  
17 Mr. DeLosReyes was responsive to this matter, that he took reasonably prudent steps to guard  
18 against missing notification of a complaint and/or hearing date, that his failure to appear was  
19 inadvertent and that he will appear at a hearing if this request for rehearing is granted.

20 Dated this 6<sup>th</sup> day of July, 2026. NEVADA REAL ESTATE LAW

21 by:   
22 KATHRYN HOLBERT, ESQ.

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27 [kathryn@NVRElaw.com](mailto:kathryn@NVRElaw.com)  
28 Attorney for Respondent  
Tommy DeLosReyes

1  
2 **CERTIFICATE OF SERVICE and/or MAILING**

3 I hereby certify that on the 10th day of July, 2026, I caused  
4 be served a true copy of the following document(s):

5 **MOTION FOR REHEARING**  
6 **and**  
7 **REQUEST TO STAY IMPOSITION OF DISCIPLINARY ACTION**

8 to be served upon the Nevada Real Estate Division by hand delivering the same.

9 I also served the following via email.

10 Amy Reveyrand  
11 Commission Coordinator  
areveyrand@ag.nv.gov

William C. Peper, Esq.  
Deputy Attorney General  
wpeper@ag.nv.gov

12 Dated this 10th day of July, 2026. NEVADA REAL ESTATE LAW

13 by: [Signature]  
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