

BEFORE THE REAL ESTATE COMMISSION
STATE OF NEVADA

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

Petitioner,

vs.

TAMMY ("TAMI") L. LORD,
(B.1001815.LLC),

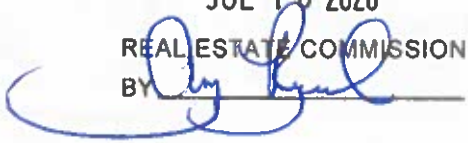
Respondent.

Case No. 2024-797

FILED

JUL 10 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 TAMMY ("TAMI") L. LORD ("RESPONDENT LORD") 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

At all relevant times pertinent to the violations in this Complaint, RESPONDENT LORD has held a Nevada broker license (B.1001815.LLC) 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 LORD has been a licensed Nevada broker (B.1001815.LLC) affiliated with SRS Real Estate Partners, LLC. [NRED0093-0094].
2. At all times relevant to this Complaint, Patrick Luther has been a licensed Nevada salesperson (S.0169792) affiliated with SRS Real Estate Partners, LLC, under the supervision of RESPONDENT LORD. [NRED0091-0092].

1 3. At all times relevant to this Complaint, Jared Davis has been an Arizona real estate
2 licensee who has never held a license issued by the Nevada Real Estate Division. [NRED0002-0003;
3 0095-0105].

4 4. Instead, Davis is an Arizona real estate licensee and has been employed with SRS Real
5 Estate Partners, LLC. [NRED0095-0105].

6 5. On August 27, 2024, the Division received a Statement of Fact from COMPLAINANT
7 John Mitteness against Patrick Luther and Jared Davis. [NRED0002-0003; 0004-0089].

8 6. COMPLAINANT Mitteness alleges, generally, that Luther and Davis denied him
9 commissions for three properties that were going to close:

- 10 a. Don Tortaco location at Ann Road and N. 5th St., Las Vegas, NV 89031, ("Don Tortaco"),
- 11 b. Take 5 Oil Change, 4320 N. Rancho Rd. Las Vegas, NV 89108, which closed on time.
- 12 c. 7-Eleven property at Ann Road and N. 5th St., Las Vegas, NV 89031, ("7-Eleven")
- 13 [NRED0002-0003;0004-0089]

14 7. COMPLAINANT Mitteness also provided documents for a fourth property at 3900
15 Meadows Ln., Las Vegas, NV 89107, ("3900 Meadows Ln." or "SafeNest").

16 8. On September 5, 2024, the Division issued an open investigation letter to Luther regarding
17 COMPLAINANT Mitteness' Statement of Fact and requesting his response via affidavit, as well as
18 documentation and transaction files concerning the aforementioned properties, with a deadline of
19 September 20, 2024. [NRED0106-0107].

20 9. On September 6, 2024, the Division issued an open investigation letter to RESPONDENT
21 LORD regarding COMPLAINANT Mitteness' Statement of Fact against her salesperson, Patrick Luther,
22 a Nevada Salesperson under her supervision, and Jared Davis, and requesting her response via affidavit,
23 as well as documentation and transaction files concerning the aforementioned properties, with a deadline
24 of September 20, 2024.. [NRED0108-0109].

25 10. On September 6, 2024, RESPONDENT LUTHER submitted an initial responsive
26 affidavit, responding to Complainant Mitteness' allegations. [NRED0116-0117].

27 11. On September 10, 2024, RESPONDENT LUTHER submitted a 2nd responsive affidavit
28 setting for more specific details regarding the Don Tortaco, Take 5, and 7-Eleven transactions.

1 [NRED0118-0119].

2 12. On October 11, 2024, RESPONDENT LORD submitted her responsive affidavit, along
3 with documents in her possession the Don Tortaco, Take 5, SafeNest, and 7-Eleven transactions.
4 [NRED0118-0119; 0120-0263].

5 13. In her response, she noted that “[p]rior to receipt of Case No. 2024-797, [she] was unaware
6 that there were commission/fee complaints or that Jared Davis was handling the transactions in Nevada,”
7 that she and RESPONDENT LUTHER have had “multiple conversations specifically emphasizing the
8 importance that only licensed brokers could transact deals in Nevada, and that it was [her] understanding
9 that Patrick Luther was leading and handling this transaction.” [NRED0118-0119].

10 14. RESPONDENT LORD also noted, in her response, that “[a]fter receiving this complaint
11 and reviewing the emails provided, it [was] evident that Jared Davis also engaged in communications
12 regarding these transactions without [her] knowledge.” [NRED0118-0120].

13 15. RESPONDENT LORD further noted that she “immediately sent a letter to Jared Davis
14 instructing him to cease all activity and refer all transactions or secure a Nevada real estate license.”
15 [NRED0118-0120].

16 16. RESPONDENT LORD included a copy of her September 3, 2024, letter to Jared Davis
17 in her response to the Division. [NRED0120].

18 17. According to the broker revenue summary for “Don Tortaco- E. Ann Rd. and N. 5th Street”
19 (“Don Tortaco”), Jared Davis was identified as the “Referring Broker” and assigned a 48.83%
20 commission split of the \$79,960.00 earned on the transaction, while Patrick Luther was assigned a
21 24.41% agent percentage and RESPONDENT LORD was identified as having “Licensing/Territory” role
22 and received 2.35%. [NRED00196].

23 18. According to the broker revenue summary for 3900 Meadows Ln (SafeNest), Jared Davis
24 was identified as the “Referring Broker” and assigned a 71.25% commission split of the \$34,500.00
25 earned on the transaction, while RESPONDENT LORD was identified as having “Licensing/Territory”
26 role and received 5.00% and Patrick Luther signed off on the transaction in the section entitled “Market
27 Leader Approval.” [NRED0250].

28 19. According to the broker revenue summary for 4320 N. Rancho Drive (Take 5),

1 RESPONDENT Davis was identified as the "Referring Broker" and assigned a 48.50% commission split
2 of the \$50,000.00 earned on the transaction, while Patrick Luther was assigned a 24.25% agent
3 percentage and RESPONDENT LORD was identified as having "Licensing/Territory" role and received
4 3.00%. [NRED0261].

5 20. On October 28, 2025, the Division mailed NRS 233B letters via certified mail to
6 RESPONDENT LORD and Patrick Luther, stating the Division's intent to file a complaint with the
7 Commission for violations of NRS 645.235(1)(b). [NRED0264-0270].

8 VIOLATIONS OF LAW

9 RESPONDENT LORD has committed the following violations of law:

10 1. RESPONDENT LORD violated NRS 645.633(1)(c) pursuant to NRS 645.235(1)(b) by
11 knowingly assisting Jared Davis, an unlicensed individual, in performing real estate activities for which
12 a license is required with regard to the E. Ann Rd. and N. 5th Street, "Don Tortaco" property.

13 2. RESPONDENT LORD violated NRS 645.633(1)(c) pursuant to NRS 645.235(1)(b) by
14 knowingly assisting Jared Davis, an unlicensed individual, in performing real estate activities for which
15 a license is required with regard to 3900 Meadows Ln. "SafeNest" property.

16 3. RESPONDENT LORD violated NRS 645.633(1)(c) pursuant to NRS 645.235(1)(b) by
17 knowingly assisting Jared Davis, an unlicensed individual, in performing real estate activities for which
18 a license is required with regard to the 4320 N. Rancho Drive "Take 5" property.

19 4. RESPONDENT LORD violated NRS 645.633(1)(c) pursuant to NRS 645.235(1)(b) by
20 knowingly assisting Jared Davis, an unlicensed individual, in performing real estate activities for which
21 a license is required with regard to the E. Ann Road and N. 5th St., "7-Eleven" property.

22 5. RESPONDENT LORD violated NRS 645.660(3) by failing to maintain adequate
23 supervision of salesperson Patrick Luther, who was associated with her, where Luther committed
24 violations of NRS 645 by knowingly assisting Jared Davis in performing real estate activities in Nevada
25 without a license.

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1 **DISCIPLINE AUTHORIZED**

2 Pursuant to NRS 645.630, the Commission is empowered to impose an administrative fine of up
3 to \$10,000 per violation and suspend, revoke, or place conditions on RESPONDENT'S license if
4 warranted.

5 Additionally, pursuant to NRS 645.660(3), the Commission may suspend, revoke or deny the
6 renewal of the license of a real estate broker and may assess a civil penalty of not more than \$5,000
7 against the broker if it appears he or she has failed to maintain adequate supervision of a salesperson or
8 broker-salesperson associated with the broker and that person commits any unlawful act or violates any
9 of the provisions of this chapter.

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

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

15 **NOTICE OF HEARING**

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

19 **THE HEARING WILL TAKE PLACE** on August 11, 2026, commencing at 9:00 a.m., or as
20 soon thereafter as the Commission is able to hear the matter, and each day thereafter commencing
21 at 9:00 a.m. through August 13, 2026, or earlier if the business of the Commission is concluded. The
22 Commission meeting will be held on August 11, 2026, through August 13, 2026, at the Division of
23 Insurance, 1818 College Parkway, Suite 103, Carson City, NV 89706 with video conferencing to the
24 Nevada State Business Center, 3300 W. Sahara Avenue, 4th Floor-Nevada Room, Las Vegas, NV
25 89102.

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

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

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

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

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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 10th day of July, 2026.

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

9 By: 
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13 AARON D. FORD
14 Attorney General

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