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*Attorneys for Respondent
Tammy ("Tami") L. Lord*

FILED

JUL 28 2026

REAL ESTATE COMMISSION

BY 

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

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

Petitioner,

v.

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

Respondent.

CASE NUMBER. 2024-797

**RESPONDENT TAMMY (TAMI) L.
LORD'S ANSWER TO COMPLAINT
AND NOTICE OF HEARING**

PRELIMINARY STATEMENT AND RESERVATION OF RIGHTS

Respondent Tammy (Tami) L. Lord ("Respondent" or "Ms. Lord"), by and through her undersigned counsel, hereby submits this Answer to the Complaint and Notice of Hearing filed by the Real Estate Division of the Department of Business and Industry, State of Nevada ("Division" or "Petitioner"), Case No. 2024-797, and states as follows:

Respondent reserves all rights, claims, and defenses available to her under the Nevada Revised Statutes, the Nevada Administrative Code, the Nevada Constitution, and the United States Constitution, including but not limited to all rights afforded under NRS Chapters 233B and 645, NAC Chapter 645, and the due process protections of Article I, Section 8 of the Nevada Constitution and the Fourteenth Amendment to the United States Constitution.

1 Respondent further reserves the right to amend, supplement, or modify this Answer at any
2 time as permitted by law or upon leave of the Commission, including to assert additional defenses
3 as further discovery and investigation may warrant.

4 To the extent any allegation in the Complaint and Notice of Hearing is not specifically
5 admitted herein, it is denied. Any failure to specifically respond to any allegation shall not be
6 construed as an admission.

7 RESPONSES TO FACTUAL ALLEGATIONS

8
9 **Jurisdiction.** Respondent admits that, at all relevant times, she held a Nevada broker license
10 (B.1001815.LLC) affiliated with SRS Real Estate Partners, LLC, and is therefore subject to the
11 jurisdiction of the Division and the Commission pursuant to NRS Chapter 645 and NAC Chapter
12 645. To the extent the Complaint alleges or implies any additional jurisdictional facts, Respondent
13 denies the same.

14 **1. Response to Allegation 1.** Admitted. Respondent admits that at all times relevant to this
15 Complaint, she has been a licensed Nevada broker (B.1001815.LLC) affiliated with SRS Real
16 Estate Partners, LLC. (NRED0093-0094.)

17 **2. Response to Allegation 2.** Admitted in part. Respondent admits that Patrick Luther has
18 been a licensed Nevada salesperson (S.0169792) affiliated with SRS Real Estate Partners, LLC,
19 under the supervision of Respondent during the relevant period. (NRED0091-0092.) Respondent
20 denies any implication that Luther's affiliation establishes inadequate supervision by Respondent
21 or imposes strict vicarious liability upon Respondent for Luther's conduct.

22 **3. Response to Allegation 3.** Admitted in part; denied in part. Respondent admits that Jared
23 Davis has been an Arizona real estate licensee and that Davis did not hold an active Nevada real
24 estate license during the period relevant to this Complaint. However, to the extent this allegation
25 asserts that Davis has never held a license issued by the Nevada Real Estate Division, Respondent
26 denies the same, as Division records (NRED0002-0003; NRED0095-0105) reflect that a Jared Lee
27 Davis previously held a Nevada salesperson license that was closed/expired by approximately
28 2012.



1 **4. Response to Allegation 4.** Admitted. Respondent admits that Davis is an Arizona real
2 estate licensee and has been employed with SRS Real Estate Partners, LLC but deny that he was
3 supervised by Ms. Lord. (NRED0095-0105.)

4 **5. Response to Allegation 5.** Respondent lacks sufficient knowledge or information to
5 admit or deny the circumstances under which the Division received Complainant John Mitteness's
6 Statement of Fact, as such receipt is within the Division's records. To the extent the referenced
7 documents (NRED0002-0003; 0004-0089) speak for themselves, Respondent admits only that
8 Mitteness filed a complaint against Patrick Luther and Jared Davis.

9 **6. Response to Allegation 6.** Respondent admits that Complainant Mitteness's Statement
10 of Fact generally alleges commission disputes relating to certain properties. Respondent denies
11 that the characterization in the Complaint accurately or fully represents the underlying facts. The
12 referenced documents (NRED0002-0003; 0004-0089) speak for themselves.

13 **7. Response to Allegation 7.** Respondent lacks sufficient knowledge or information to
14 admit or deny whether Complainant Mitteness provided documents regarding 3900 Meadows Lane,
15 Las Vegas, NV 89107 ("SafeNest"), as such matters are within the Division's and Complainant's
16 records.

17 **8. Response to Allegation 8.** Respondent admits that the Division issued an open
18 investigation letter to Luther on or about September 5, 2024, to the extent reflected in the referenced
19 documents. (NRED0106-0107.)

20 **9. Response to Allegation 9.** Admitted. Respondent admits that the Division issued an open
21 investigation letter to Respondent on or about September 6, 2024, regarding Complainant
22 Mitteness's Statement of Fact, requesting her response via affidavit and documentation.
23 (NRED0108-0109.)

24 **10. Response to Allegation 10.** Respondent admits that Luther submitted an initial
25 responsive affidavit on or about September 6, 2024, to the extent reflected in the referenced
26 document. (NRED0116-0117.) Respondent lacks sufficient knowledge or information to admit or
27 deny the specific contents of Luther's affidavit beyond what is stated on the face of that document.
28



1 **11. Response to Allegation 11.** Respondent admits that Luther submitted a second
2 responsive affidavit on or about September 10, 2024, setting forth more specific details regarding
3 the Don Tortaco, Take 5, and 7-Eleven transactions. (NRED0118-0119.) The document speaks for
4 itself.

5 **12. Response to Allegation 12.** Admitted. On October 11, 2024, Respondent submitted her
6 responsive affidavit, along with documents in her possession concerning the Don Tortaco, Take 5,
7 SafeNest, and 7-Eleven transactions. (NRED0118-0119; 0120-0263.)

8 **13. Response to Allegation 13.** Admitted. Respondent admits that in her October 11, 2024
9 response, she noted that prior to receipt of Case No. 2024-797, she was unaware that there were
10 commission/fee complaints or that Jared Davis was handling transactions in Nevada; that she and
11 Luther have had multiple conversations specifically emphasizing the importance that only licensed
12 brokers could transact deals in Nevada; and that it was her understanding that Patrick Luther was
13 leading and handling these transactions. (NRED0118-0119.)

14 **14. Response to Allegation 14.** Admitted. Respondent admits that in her response she also
15 noted that after receiving this complaint and reviewing the emails provided, it was evident that
16 Jared Davis also engaged in communications regarding these transactions without her knowledge.
17 (NRED0118-0120.)

18 **15. Response to Allegation 15.** Admitted. Respondent admits that in her response she
19 further noted that she immediately sent a letter to Jared Davis instructing him to cease all activity
20 and refer all transactions or secure a Nevada real estate license. (NRED0118-0120.)

21 **16. Response to Allegation 16.** Admitted. Respondent admits that she included a copy of
22 her September 3, 2024 letter to Jared Davis in her response to the Division. (NRED0120.)

23 **17. Response to Allegation 17.** Admitted in part; denied in part. Respondent admits that
24 the broker revenue summary for the Don Tortaco transaction (NRED00196) appears to contain the
25 labels and percentage allocations described in this allegation, including the identification of Jared
26 Davis as "Referring Broker" with a 48.83% commission split, Patrick Luther with a 24.41% agent
27 percentage, and Respondent with a "Licensing/Territory" designation at 2.35%. Respondent denies
28 that such internal accounting labels or designations prove that Respondent knowingly assisted,



1 authorized, or directed Davis to perform licensed real estate activities in Nevada. Respondent
2 further denies any legal conclusions or inferences drawn from such internal documents.

3 18. **Response to Allegation 18.** Admitted in part; denied in part. Respondent admits that
4 the broker revenue summary for the SafeNest transaction (NRED0250) appears to contain the labels
5 and percentage allocations described in this allegation, including the identification of Jared Davis
6 as "Referring Broker" with a 71.25% commission split, Respondent with a "Licensing/Territory"
7 designation at 5.00%, and Patrick Luther's "Market Leader Approval" sign-off. Respondent denies
8 that such internal accounting labels constitute evidence that Respondent knowingly assisted or
9 authorized Davis to engage in licensed real estate activities in Nevada without a license.
10 Respondent further denies any legal conclusions or inferences drawn therefrom.

11 19. **Response to Allegation 19.** Admitted in part; denied in part. Respondent admits that
12 the broker revenue summary for the Take 5 transaction (NRED0261) appears to contain the labels
13 and percentage allocations described in this allegation, including the identification of Davis as
14 "Referring Broker" with a 48.50% commission split, Patrick Luther with a 24.25% agent
15 percentage, and Respondent with a "Licensing/Territory" designation at 3.00%. Respondent denies
16 that such internal accounting labels or designations prove knowing assistance, authorization, or
17 direction by Respondent of unlicensed activity by Davis. Respondent further denies any legal
18 conclusions or inferences the Division seeks to draw from such documents.

19 20. **Response to Allegation 20.** Admitted. Respondent admits that on or about October 28,
20 2025, the Division mailed NRS 233B letters via certified mail to Respondent and Patrick Luther,
21 stating the Division's intent to file a complaint with the Commission for violations of NRS
22 645.235(1)(b). (NRED0264-0270.) However, Respondent did not receive the letters because they
23 were directed to an outdated address.

24 **RESPONSES TO ALLEGED VIOLATIONS OF LAW**

25 Respondent denies the introductory statement that "RESPONDENT LORD has committed
26 the following violations of law." This characterization is a legal conclusion to which no response
27 is required; however, to the extent a response is deemed required, Respondent denies the same in
28 its entirety.



1 **1. Response to Violation 1 (Don Tortaco — NRS 645.633(1)(c) pursuant to NRS**
2 **645.235(1)(b)).** Denied. Respondent denies that she violated NRS 645.633(1)(c) pursuant to NRS
3 645.235(1)(b) by knowingly assisting Jared Davis, an unlicensed individual, in performing real
4 estate activities for which a license is required with regard to the E. Ann Road and N. 5th Street
5 “Don Tortaco” property. Respondent was unaware that Davis was handling or communicating on
6 Nevada transactions and did not knowingly assist, authorize, or direct any unlicensed activity by
7 Davis. Respondent’s “Licensing/Territory” designation on internal revenue summaries was an
8 accounting and territorial classification, not evidence of knowing assistance with unlicensed real
9 estate activity.

10 **2. Response to Violation 2 (SafeNest: NRS 645.633(1)(c) pursuant to NRS**
11 **645.235(1)(b)).** Denied. Respondent denies that she violated NRS 645.633(1)(c) pursuant to NRS
12 645.235(1)(b) by knowingly assisting Jared Davis in performing real estate activities for which a
13 license is required with regard to the 3900 Meadows Lane “SafeNest” property. For the same
14 reasons set forth in response to Violation 1, Respondent had no knowledge that Davis was
15 performing licensed activities in Nevada on this transaction, and no evidence demonstrates that
16 Respondent knowingly permitted, assisted, or directed such conduct.

17 **3. Response to Violation 3 (Take 5: NRS 645.633(1)(c) pursuant to NRS 645.235(1)(b)).**
18 Denied. Respondent denies that she violated NRS 645.633(1)(c) pursuant to NRS 645.235(1)(b) by
19 knowingly assisting Jared Davis in performing real estate activities for which a license is required
20 with regard to the 4320 N. Rancho Drive “Take 5” property. Respondent was not aware that Davis
21 was engaging in Nevada-licensed real estate activity on this transaction and did not knowingly
22 assist or facilitate the same.

23 **4. Response to Violation 4 (7-Eleven: NRS 645.633(1)(c) pursuant to NRS**
24 **645.235(1)(b)).** Denied. Respondent denies that she violated NRS 645.633(1)(c) pursuant to NRS
25 645.235(1)(b) by knowingly assisting Jared Davis in performing real estate activities for which a
26 license is required with regard to the E. Ann Road and N. 5th Street “7-Eleven” property.
27 Respondent reiterates that she lacked knowledge of Davis’s involvement in Nevada transactions
28 and did not knowingly assist, direct, or authorize unlicensed activity.



1 **5. Response to Violation 5 (Failure to Supervise: NRS 645.660(3)).** Denied. Respondent
2 denies that she violated NRS 645.660(3) by failing to maintain adequate supervision of salesperson
3 Patrick Luther. As pleaded, NRS 645.660(3) requires proof that Respondent failed to maintain
4 adequate supervision and that an associated salesperson or broker-salesperson committed an
5 unlawful act or violated NRS Chapter 645. Respondent maintained policies, procedures, and
6 systems consistent with the reasonable supervision standard required by NAC 645.600. Respondent
7 had multiple direct conversations with Luther emphasizing that only licensed brokers could transact
8 deals in Nevada, understood Luther to be leading and handling the Nevada transactions, and was
9 deceived by the undisclosed communications and activities of Jared Davis. Respondent's
10 supervision was reasonable under all the circumstances, and the Division cannot establish either
11 the alleged predicate violation by Luther or the requisite nexus between any supervisory deficiency
12 and Luther's alleged knowing assistance of Davis. *See Real Estate Div., Dep't of Commerce v.*
13 *Jones*, 98 Nev. 260, 645 P.2d 1371 (1982); *State Dep't of Commerce, Real Estate Div. v. Soeller*,
14 98 Nev. 579, 656 P.2d 224 (1982).

15 **RESPONSE TO DISCIPLINE AUTHORIZED AND PRAYER**

16 The allegations contained in the Complaint's sections titled "Discipline Authorized" and
17 the Division's prayer for relief state legal conclusions to which no response is required. To the
18 extent a response is deemed required, Respondent denies that any discipline, fine, revocation,
19 suspension, denial of renewal, condition, or assessment of costs is warranted against Respondent
20 and denies that the Division is entitled to the relief requested or any relief whatsoever.

21 **AFFIRMATIVE DEFENSES**

22 Without waiving any denial, objection, or defense set forth above, and without assuming
23 any burden of proof or persuasion properly belonging to the Division, Respondent asserts the
24 following affirmative defenses:

25 **1. FIRST DEFENSE: Failure to State a Claim / Failure to Establish All Elements.** The
26 Complaint fails to state facts sufficient to establish all elements of the alleged violations of NRS
27 645.633(1)(c), NRS 645.235(1)(b), and NRS 645.660(3). As to each count, the Division has failed
28 to plead facts that, if proven, would demonstrate Respondent's knowing assistance of unlicensed
activity or culpable failure to supervise.



1 **2. SECOND DEFENSE: Lack of Knowing Assistance Under NRS 645.235(1)(b), as**
2 **Charged Through NRS 645.633(1)(c).** NRS 645.235(1)(b), as incorporated into the disciplinary
3 theory pleaded under NRS 645.633(1)(c), requires proof that Respondent knowingly assisted, or
4 offered to assist, another person in committing unlicensed Nevada real estate activity. The
5 knowledge element arises from NRS 645.235(1)(b); Respondent does not concede that NRS
6 645.633(1)(c) independently adds elements beyond the theory charged by the Division. Respondent
7 did not know that Jared Davis was performing licensed real estate activities in Nevada. Respondent
8 was unaware of Davis's communications regarding the transactions at issue, had emphasized to
9 Luther that only licensed brokers could transact in Nevada, and understood Luther to be leading
10 and handling all Nevada activities. The evidence demonstrates lack of knowledge, and the Division
11 cannot satisfy its burden to prove knowing assistance or an offer to assist.

12 **3. THIRD DEFENSE: Reasonable Supervision Under NRS 645.660(3) and NAC**
13 **645.600.** To the extent the Complaint alleges a failure to maintain adequate supervision of
14 salesperson Patrick Luther under NRS 645.660(3), Respondent maintained reasonable supervisory
15 policies, procedures, and systems consistent with NAC 645.600. NAC 645.600 requires policies,
16 rules, procedures, and systems for review, oversight, and management, together with a system for
17 monitoring compliance; it also permits a broker to use a broker-salesperson to assist in
18 administering those duties so long as the broker does not relinquish overall responsibility.
19 Respondent established rules and procedures prohibiting unlicensed Nevada activity, directly
20 communicated those policies to Luther in multiple conversations, and maintained compliance
21 monitoring systems. NAC 645.600 requires reasonable, not perfect, supervision. The standard is
22 not one of strict liability. A broker who establishes compliant systems and is deceived by
23 subordinates or third parties has satisfied the reasonable supervision standard.

24 **4. FOURTH DEFENSE: No Strict Vicarious Liability / No Personal Culpability**
25 **(Jones, Lowe, Soeller).** Nevada law does not impose strict vicarious liability upon a supervising
26 broker for all acts of associated licensees or employees. The Nevada Supreme Court requires
27 independent proof of the broker's own culpability, incompetence, or negligence before disciplinary
28 action may be sustained. *Real Estate Div., Dep't of Commerce v. Jones*, 98 Nev. 260, 645 P.2d



1 1371 (1982) (discipline against supervising broker fails absent proof of broker's own culpability,
2 incompetence, or negligence); *Lowe v. State Dep't of Commerce, Real Estate Div.*, 89 Nev. 488,
3 515 P.2d 388 (1973) (reversing discipline where alleged violations lacked factual support and no
4 fraud, dishonesty, or impropriety shown); *State Dep't of Commerce, Real Estate Div. v. Soeller*, 98
5 Nev. 579, 656 P.2d 224 (1982) (affirming discipline only where affirmative evidence supported
6 failure to act). The Division has not and cannot establish that Respondent personally engaged in
7 culpable, negligent, or incompetent conduct warranting discipline.

8 **5. FIFTH DEFENSE: Good Faith Reliance on Licensed Nevada Salesperson and**
9 **Compliant Internal Systems.** Respondent acted in good faith reliance on her licensed Nevada
10 salesperson, Patrick Luther (S.0169792), whom she reasonably understood to be leading and
11 handling all Nevada real estate transactions. Respondent maintained written guidance and
12 compliance policies emphasizing that out-of-state licensees cannot list or market Nevada property
13 without a Nevada license and that only licensed brokers could transact deals in Nevada. To the
14 extent Respondent relies on SRS guidance, she does so not as a substitute for Nevada law, but as
15 evidence that she and SRS maintained systems designed to route Nevada work to Nevada licensees,
16 require broker-of-record involvement, and flag Nevada as a high-regulation jurisdiction. SRS Real
17 Estate Partners, LLC maintained internal guidance stating that if an unlicensed SRS broker from
18 another state completes a Nevada transaction without informing the Nevada broker of record, the
19 Nevada broker of record is not responsible, though reporting is recommended. Respondent's
20 reliance on these systems and on Luther's representations was reasonable and in good faith.

21 **6. SIXTH DEFENSE: Deception, Concealment, and Unilateral Conduct by Jared**
22 **Davis and/or Others.** Jared Davis engaged in communications and activities related to Nevada
23 real estate transactions without Respondent's knowledge, authorization, or consent. Davis's
24 conduct was unilateral, unauthorized, and concealed from Respondent. Respondent only learned of
25 Davis's communications after receiving the complaint in Case No. 2024-797 and reviewing emails.
26 Where a broker is actively deceived by subordinates or affiliates engaging in unauthorized activity,
27 the broker's lack of knowledge negates the knowing-assistance element under NRS 645.235(1)(b),
28 as charged through NRS 645.633(1)(c), and is inconsistent with negligent supervision. *See Jones*,
98 Nev. at 260, 645 P.2d at 1371.



1 **7. SEVENTH DEFENSE: Prompt Corrective Action and Mitigation.** Upon learning of
2 Davis's communications regarding Nevada transactions, Respondent immediately sent a letter to
3 Davis dated September 3, 2024 (NRED0120) directing him to cease all activity and either refer all
4 transactions or secure a Nevada real estate license. This prompt corrective action demonstrates
5 Respondent's good faith, diligence, and commitment to compliance with Nevada licensing
6 requirements. Respondent's immediate remedial measures militate against the imposition of
7 discipline.

8 **8. EIGHTH DEFENSE: No Causation or Nexus Between Respondent's Conduct and**
9 **Alleged Unlicensed Activity.** The Division has failed to establish any causal nexus between any
10 act or omission of Respondent and the alleged unlicensed activity of Jared Davis. Davis was
11 employed by SRS Real Estate Partners, LLC at the corporate level, held an Arizona real estate
12 license, operated from out of state, and communicated without Respondent's knowledge. No
13 evidence connects Respondent's conduct to Davis's alleged performance of licensed activities in
14 Nevada. Without such a nexus, discipline may not be imposed. *See Jones*, 98 Nev. at 260, 645 P.2d
15 at 1371; *Soeller*, 98 Nev. at 579, 656 P.2d at 224.

16 **9. NINTH DEFENSE: Internal Accounting Labels, Referral Concepts, and**
17 **Commission Allocations Do Not Establish Knowing Assistance.** The broker revenue summaries
18 referenced in the Complaint identify Respondent with a "Licensing/Territory" designation and
19 small percentage allocations (2.35%, 5.00%, and 3.00%). These internal accounting and territorial
20 designations were used for corporate overhead, licensing compliance, and territory management
21 purposes. They do not constitute evidence of knowing assistance or authorization of unlicensed
22 activity, and the Division cannot impute knowledge or culpable intent from such internal corporate
23 accounting labels. To the extent the Division relies on the term "Referring Broker" or on a
24 commission allocation to Davis, Nevada guidance recognizes that referral-fee concepts and
25 commission-routing mechanics are not themselves dispositive of unlicensed activity; the statutory
26 question remains what conduct was performed, by whom, in what capacity, and with Respondent's
27 knowledge. Those principles do not excuse unlicensed brokerage activity, but they confirm that
28 labels and allocations alone do not prove the charged violations.

1 **10. TENTH DEFENSE: Due Process / Protected Property Interest (Nev. Const. Art. I,**
2 **Sec. 8; NRS Chapter 233B).** Respondent holds a protected property interest in her professional
3 real estate broker license. The Nevada Constitution, Article I, Section 8, and the due process
4 protections of NRS Chapter 233B prohibit the deprivation of a professional license without proof
5 of personal fault, culpability, or negligence. Due process requires that discipline be supported by
6 substantial evidence of Respondent's own misconduct, not merely the unauthorized acts of third
7 parties. Imposing discipline based on vicarious or imputed liability without proof of Respondent's
8 personal fault would violate Respondent's due process rights.

9 **11. ELEVENTH DEFENSE: Burden of Proof and Substantial Evidence.** The Division
10 bears the burden of proving each element of each alleged violation by a preponderance of the
11 evidence, or such higher standard as may be required. Any finding of a violation must be supported
12 by substantial evidence in the record. The Division cannot meet its burden on any count alleged, as
13 the evidence demonstrates Respondent's lack of knowledge, reasonable supervision, and good faith
14 compliance.

15 **12. TWELFTH DEFENSE: Laches, Delay, and Procedural Fairness.** To the extent
16 supported by the record, Respondent asserts that unreasonable delay by the Division in
17 investigating, notifying Respondent, or commencing formal proceedings has prejudiced
18 Respondent's ability to mount a defense. The Division received the Mitteness Statement of Fact on
19 August 27, 2024, did not mail NRS 233B pre-complaint letters until October 28, 2025 (more than
20 thirteen months later, and even then the letters were directed to an outdated address), and did not
21 file the Complaint and Notice of Hearing until July 10, 2026. Respondent reserves the right to
22 develop this defense further at hearing.

23 **13. THIRTEENTH DEFENSE: Scope of Allegations Limited to Pleaded Transactions.**
24 Respondent objects to any attempt by the Division to introduce evidence or seek discipline
25 regarding any transaction, conduct, or allegation not specifically identified in the Complaint and
26 Notice of Hearing. Respondent's obligation to respond is limited to the four specifically identified
27 transactions (Don Tortaco, SafeNest, Take 5, and 7-Eleven) and the five numbered violations
28 alleged. Any expansion beyond the scope of the Complaint without proper notice and opportunity
to respond would violate Respondent's due process rights.



1 **14. FOURTEENTH DEFENSE: Evidentiary Objections and Reservation of Rights.**

2 Respondent reserves all rights to challenge the admissibility, relevance, authenticity, and
3 foundation of any evidence the Division may seek to introduce at hearing, including but not limited
4 to hearsay, unauthenticated documents, documents outside the scope of the Complaint, and any
5 evidence that is more prejudicial than probative. Respondent further reserves all rights to object to
6 the imposition of investigative costs, attorney's fees, or sanctions under NRS 622.400 to the extent
7 such imposition would be improper, unreasonable, or unconstitutional.

8 **15. FIFTEENTH DEFENSE: Settlement Communications Protected; Remedial**

9 **Measures Not Admissions.** To the extent the Division seeks to use settlement communications or
10 offers of compromise to prove liability, fault, or the validity of the charged violations, Respondent
11 objects under all applicable evidentiary protections, including NRS 48.105. To the extent the
12 Division seeks to use subsequent remedial measures or corrective actions, Respondent denies that
13 such measures are admissions of liability, fault, or violation, while reserving the right to rely on
14 them for mitigation, good faith, compliance, and prospective public-protection purposes.

15 **16. SIXTEENTH DEFENSE: Proportionality and Excessive Penalty.** Even if the

16 Commission were to find any violation (which Respondent denies), the discipline sought or
17 potentially imposed must be proportionate to the conduct alleged and the evidence adduced. Given
18 Respondent's lack of knowledge, reasonable supervisory practices, prompt corrective action, the
19 absence in the present record of evidence proving prior comparable discipline, and good faith, any
20 penalty exceeding the minimum would be excessive, disproportionate, and an abuse of discretion.
21 *See Lowe*, 89 Nev. at 488, 515 P.2d at 388 (reversing suspension where evidence did not support
22 violations).

23 **17. SEVENTEENTH DEFENSE: Distinguishing Department of Business and**

24 **Industry, *Real Estate Division v. Mansour*, 564 P.3d 449 (Nev. 2025).** To the extent the Division
25 relies on *Mansour* for the proposition that assisting unlicensed activity is a basis for discipline,
26 Respondent distinguishes that case. The Division must still prove that Respondent *knowingly*
27 assisted Davis and personally committed or culpably failed to supervise the conduct alleged. The
28 evidence here establishes the opposite: Respondent was deceived, had no knowledge, and took



1 immediate corrective action upon discovering Davis's unauthorized communications. *See also*
2 *Hudler v. Anderson*, 125 Nev. 1045, 281 P.3d 1183 (2009) (capacity and specific conduct matter
3 in evaluating unlicensed-activity allegations).

4 **18. EIGHTEENTH DEFENSE: Statutory and Regulatory Compliance With Licensing**
5 **and Brokerage Structure.** Respondent was an active Nevada broker affiliated with SRS Real
6 Estate Partners, LLC, Patrick Luther was an active Nevada salesperson associated with SRS Real
7 Estate Partners, LLC, and transaction documents identified Patrick Luther as the Nevada licensee
8 and Respondent as the broker where required. Respondent's position is that the Nevada-side
9 licensing structure existed and that any alleged unlicensed conduct by Davis occurred outside her
10 knowledge and outside the compliance structure she understood to be controlling. Those facts
11 support compliance with Nevada licensing and supervisory obligations and defeat any claim that
12 Respondent knowingly assisted a non-Nevada licensee in evading NRS Chapter 645.

13 **19. NINETEENTH DEFENSE: Additional Equitable Defenses.** Respondent reserves the
14 right to assert any additional affirmative, equitable, or legal defenses that may become available
15 upon further investigation, discovery, or development of the record, including but not limited to
16 estoppel, waiver, unclean hands, and any other defenses recognized under Nevada administrative
17 law.

18 **PRAYER FOR RELIEF**

19 **WHEREFORE,** Respondent Tammy (Tami) L. Lord respectfully requests that the
20 Commission:

- 21 1. Dismiss the Complaint and Notice of Hearing in its entirety with prejudice;
- 22 2. Enter findings that Respondent did not violate NRS 645.633(1)(c) pursuant to NRS
23 645.235(1)(b) as alleged in Violations 1 through 4;
- 24 3. Enter findings that Respondent did not violate NRS 645.660(3) as alleged in
25 Violation 5;
- 26 4. Decline to impose any fine, suspension, revocation, denial of renewal, condition, or
27 other discipline upon Respondent's license;
- 28 5. Decline to impose any investigative costs, attorney's fees, or other costs upon
Respondent under NRS 622.400 or any other provision;

6. Grant such other and further relief as the Commission deems just and equitable.

Respectfully Submitted,

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By: /s/ John Evans Bragonje

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Attorneys for Respondent Tammy ("Tami") L. Lord

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WOMBLE BOND DICKINSON



CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of July, 2026, I caused a true and correct copy of the foregoing **RESPONDENT TAMMY (TAMI) L. LORD'S ANSWER TO COMPLAINT AND NOTICE OF HEARING** to be served as follows:

VIA U.S. MAIL AND EMAIL:

Phil W. Su
Senior Deputy Attorney General
1 State of Nevada Way, Suite 100
Las Vegas, Nevada 89119
psu@ag.nv.gov

FILED WITH:

Real Estate Division
State of Nevada
3300 W. Sahara Avenue, Suite 350
Las Vegas, Nevada 89102
Attn: Legal Administrative Officer

By: /s/ Luz Horvath
An Employee of Womble Bond Dickinson (US) LLP

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Suite 400
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WOMBLE BOND DICKINSON

