

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

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

Case No. 2024-796

Petitioner,

vs.

PATRICK LUTHER,
(B.1003241.LP ACTIVE),
(S.0169792 CLOSED),

Respondent.

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 RESPONDENTS PATRICK LUTHER ("RESPONDENT LUTHER") 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 LUTHER has held a Nevada salesperson license (S.0169792) 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 LUTHER has been a licensed Nevada salesperson (S.0169792) affiliated with SRS Real Estate Partners, LLC. [NRED0091-0092].

2. At all times relevant to this Complaint, Tami Lord ("Broker Lord" or "Lord") has been a licensed Nevada broker (B.1001815.LLC) affiliated with SRS Real Estate Partners, LLC. [NRED0093-0094].

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 RESPONDENT LUTHER and Jared Davis. [NRED0002-0003; 0004-0089].

8 6. COMPLAINANT Mitteness alleged, generally, that RESPONDENT LUTHER and Davis
9 denied him 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 ("Take 5"), and
- 13 c. 7-Eleven location at Ann Road and N. 5th St., Las Vegas, NV 89031, ("7-Eleven").
- 14 [NRED0002-0003;0004-0089]

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

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

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

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

28 11. On September 10, 2024, RESPONDENT LUTHER submitted a 2nd responsive affidavit

1 setting for more specific details regarding the Don Tortaco, Take 5, and 7-Eleven transactions.
2 [NRED0118-0119].

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

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

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

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

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

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

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

19. According to the broker revenue summary for 4320 N. Rancho Drive (Take 5), Jared Davis was identified as the "Referring Broker" and assigned a 48.50% commission split of the \$50,000.00 earned on the transaction, while RESPONDENT LUTHER was assigned a 24.25% agent percentage and Broker Lord was identified as having "Licensing/Territory" role and received 3.00%. [NRED0261].

20. On October 28, 2025, the Division mailed NRS 233B letters via certified mail to RESPONDENT LUTHER and Broker Lord, stating the Division's intent to file complaints with the Commission for violations of NRS 645.235(1)(b). [NRED0264-0270].

VIOLATIONS OF LAW

RESPONDENT LUTHER has committed the following violations of law:

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

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

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

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

DISCIPLINE AUTHORIZED

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

Additionally, under NRS 622.400, 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.

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

3 NOTICE OF HEARING

4 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider the
5 Administrative Complaint against the above-named Respondent in accordance with Chapters
6 233B and 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada Administrative Code.

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

14 STACKED CALENDAR: Your hearing is one of several hearings scheduled at the same
15 time as part of a regular meeting of the Commission that is expected to last from August 11, 2026,
16 through August 13, 2026, or earlier if the business of the Commission is concluded. Thus, your
17 hearing may be continued until later in the day or from day to day. It is your responsibility to be
18 present when your case is called. If you are not present when your hearing is called, a default may
19 be entered against you and the Commission may decide the case as if all allegations in the complaint
20 were true. If you have any questions, please call Amy Reveyrand, Commission Coordinator, at
21 (702) 486-4606.

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

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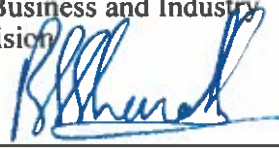
1 heard in your defense, either personally or through your counsel of choice. At the hearing, the
2 Division has the burden of proving the allegations in the complaint and will call witnesses and
3 present evidence against you. You have the right to respond and to present relevant evidence and
4 argument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

6 You have the right to request that the Commission issue subpoenas to compel witnesses to
7 testify and/or evidence to be offered on your behalf. In making the request, you may be required
8 to demonstrate the relevance of the witness' testimony and/or evidence. Other important rights
9 you have are listed in NRS 645.680 through 645.990, NRS Chapter 233B, and NAC 645.810 through
10 645.875.

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

15 DATED the 10th day of July, 2026.

16 State of Nevada
17 Department of Business and Industry
18 Real Estate Division

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