John Evans Bragonje, Bar No. 9519
John.Bragonje@wbd-us.com
WOMBLE BOND DICKINSON (US) LLP
8488 Rozita Lee Ave., Suite 400
Las Vegas, NV 89113
Tel: 702.949.8200
Fax: 702.949.8398

Attorneys for Respondent
Patrick Luther

FILED
SEP 11 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. PATRICK LUTHER (B.1003241.LP ACTIVE) (S.0169792 CLOSED), Respondent.	CASE NUMBER. 2024-796 **RESPONDENT PATRICK LUTHER'S ANSWER TO COMPLAINT AND NOTICE OF HEARING**

8488 Rozita Lee Ave
Suite 400
Las Vegas, NV 89113
WOMBLE BOND DICKINSON

PRELIMINARY STATEMENT AND RESERVATION OF RIGHTS

Respondent Patrick Luther ("Respondent" or "Mr. Luther"), by and through his 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. 2024-796, and states as follows:

Respondent reserves all rights, claims, and defenses available to him 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.

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

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

RESPONSES TO FACTUAL ALLEGATIONS

Jurisdiction. Respondent admits that, at all relevant times, he held a Nevada salesperson license (S.0169792) affiliated with SRS Real Estate Partners, LLC, and is therefore subject to the jurisdiction of the Division and the Commission pursuant to NRS Chapter 645 and NAC Chapter 645. Respondent further states that he has held a Nevada broker license (B.1003241.LP) affiliated with SRS National Net Lease Group, LP since August 5, 2025. To the extent the Complaint alleges or implies any additional jurisdictional facts, Respondent denies the same.

1. **Response to Allegation 1.** Admitted. Respondent admits that at all times relevant to this Complaint, he was a licensed Nevada salesperson (S.0169792) affiliated with SRS Real Estate Partners, LLC. (NRED0091-0092.)

2. **Response to Allegation 2.** Admitted. Respondent admits that Tami Lord has been a licensed Nevada broker (B.1001815.LLC) affiliated with SRS Real Estate Partners, LLC. (NRED0093-0094.)

3. **Response to Allegation 3.** Admitted in part; denied in part. Respondent admits that Jared Davis has been an Arizona real estate licensee and that Davis did not hold an active Nevada real estate license during the period relevant to this Complaint. However, to the extent this allegation asserts that Davis has never held a license issued by the Nevada Real Estate Division, Respondent denies the same, as Division records (NRED0002-0003; NRED0095-0105) reflect that a Jared Lee Davis previously held a Nevada salesperson license (S.0168444) that was closed/expired by approximately 2012.

4. **Response to Allegation 4.** Admitted. Respondent admits that Davis is an Arizona real estate licensee and was employed with SRS Real Estate Partners, LLC. (NRED0095-0105.)

8488 Rozita Lee Ave
Suite 400
Las Vegas, NV 89113

WOMBLE BOND DICKINSON

Respondent notes that Davis was employed at the corporate level and was not under Respondent's supervision or direction; Respondent held a salesperson license and had no supervisory authority over Davis or any other licensee.

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

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

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

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

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

10. **Response to Allegation 10.** Admitted. Respondent admits that he submitted an initial responsive affidavit on or about September 6, 2024, responding to Complainant Mitteness's allegations. (NRED0116-0117.)

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

WOMBLE BOND DICKINSON
8488 Rozita Lee Ave
Suite 400
Las Vegas, NV 89113

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

13. **Response to Allegation 13.** Admitted. Respondent admits that in Broker Lord's October 11, 2024 response, she noted that prior to receipt of Case No. 2024-797, she was unaware that there were commission/fee complaints or that Jared Davis was handling transactions in Nevada; that she and Respondent have had multiple conversations specifically emphasizing the importance that only licensed brokers could transact deals in Nevada; and that it was her understanding that Respondent was leading and handling these transactions. (NRED0118-0119.) Respondent confirms that those conversations took place and that Respondent understood himself to be the responsible Nevada licensee for all Nevada transactions.

14. **Response to Allegation 14.** Admitted. Respondent admits that Broker Lord also noted that after receiving the complaint and reviewing the emails provided, it was evident that Jared Davis also engaged in communications regarding these transactions without her knowledge. (NRED0118-0120.) Respondent states that he, too, was not fully informed of the extent to which Davis was independently engaging with parties and progressing deals without Respondent's direct involvement.

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

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

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

8488 Rozita Lee Ave
Suite 400
Las Vegas, NV 89113
WOMBLE BOND DICKINSON

authorized, or directed Davis to perform licensed real estate activities in Nevada. The broker revenue summary is a post-transaction corporate accounting document; Respondent's commission allocation reflects his role as the licensed Nevada agent on the transaction. Respondent further denies any legal conclusions or inferences drawn from such internal documents.

18. **Response to Allegation 18.** Admitted in part; denied in part. Respondent admits that the broker revenue summary for the SafeNest transaction (NRED0250) appears to contain the labels and percentage allocations described in this allegation, including the identification of Jared Davis as "Referring Broker" with a 71.25% commission split, Broker Lord with a "Licensing/Territory" designation at 5.00%, and Respondent's "Market Leader Approval" sign-off. Respondent denies that such internal accounting labels constitute evidence that Respondent knowingly assisted or authorized Davis to engage in licensed real estate activities in Nevada without a license. The "Market Leader Approval" designation is an internal corporate sign-off and does not constitute knowing assistance with unlicensed activity. Respondent further denies any legal conclusions or inferences drawn therefrom.

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

20. **Response to Allegation 20.** Admitted. Respondent admits that on or about October 28, 2025, the Division mailed NRS 233B letters via certified mail to Respondent and Broker Lord, stating the Division's intent to file a complaint with the Commission for violations of NRS 645.235(1)(b). (NRED0264-0270.) However, Respondent did not receive the letter because it was directed to an outdated address; SRS's Las Vegas office had relocated.

8488 Rozita Lee Ave
Suite 400
Las Vegas, NV 89113

WOMBLE BOND DICKINSON

RESPONSES TO ALLEGED VIOLATIONS OF LAW

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

1. **Response to Violation 1 (Don Tortaco — NRS 645.633(1)(c) pursuant to NRS 645.235(1)(b)).** Denied. Respondent denies that he 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 Street "Don Tortaco" property. Respondent was the licensed Nevada salesperson on this transaction and understood himself to be leading and handling the Nevada-side activities. Respondent did not knowingly assist, authorize, or direct any unlicensed activity by Davis. To the extent Davis communicated with parties or performed activities on this transaction, he did so unilaterally and without Respondent's knowledge or authorization. Internal commission labels on corporate accounting documents do not establish knowing assistance.

2. **Response to Violation 2 (SafeNest — NRS 645.633(1)(c) pursuant to NRS 645.235(1)(b)).** Denied. Respondent denies that he violated NRS 645.633(1)(c) pursuant to NRS 645.235(1)(b) by knowingly assisting Jared Davis in performing real estate activities for which a license is required with regard to the 3900 Meadows Lane "SafeNest" property. For the same reasons set forth in response to Violation 1, Respondent had no knowledge that Davis was performing licensed activities in Nevada on this transaction, and no evidence demonstrates that Respondent knowingly permitted, assisted, or directed such conduct. Respondent was not fully informed of the extent to which Davis was independently engaging with the parties. The "Market Leader Approval" sign-off is an internal corporate designation and does not constitute knowing assistance with unlicensed activity.

3. **Response to Violation 3 (Take 5 — NRS 645.633(1)(c) pursuant to NRS 645.235(1)(b)).** Denied. Respondent denies that he violated NRS 645.633(1)(c) pursuant to NRS 645.235(1)(b) by knowingly assisting Jared Davis in performing real estate activities for which a

8488 Rozita Lee Ave
Suite 400
Las Vegas, NV 89113

WOMBLE BOND DICKINSON

license is required with regard to the 4320 N. Rancho Drive "Take 5" property. Respondent was not aware that Davis was engaging in Nevada-licensed real estate activity on this transaction and did not knowingly assist or facilitate the same. Internal accounting labels and commission allocations do not establish knowing assistance, authorization, or direction of unlicensed activity.

4. **Response to Violation 4 (7-Eleven — NRS 645.633(1)(c) pursuant to NRS 645.235(1)(b)).** Denied. Respondent denies that he violated NRS 645.633(1)(c) pursuant to NRS 645.235(1)(b) by knowingly assisting Jared Davis in performing real estate activities for which a license is required with regard to the E. Ann Road and N. 5th Street "7-Eleven" property. Respondent reiterates that he lacked knowledge of Davis's unauthorized involvement in Nevada transactions and did not knowingly assist, direct, or authorize unlicensed activity. Respondent further denies any legal conclusions or inferences the Division seeks to draw from the referenced documents.

RESPONSE TO DISCIPLINE AUTHORIZED AND PRAYER

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

AFFIRMATIVE DEFENSES

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

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

2. **SECOND DEFENSE: Lack of Knowing Assistance Under NRS 645.235(1)(b), as Charged Through NRS 645.633(1)(c).** NRS 645.235(1)(b), as incorporated into the disciplinary

8488 Rozita Lee Ave
Suite 400
Las Vegas, NV 89113
WOMBLE BOND DICKINSON

theory pleaded under NRS 645.633(1)(c), requires proof that Respondent knowingly assisted, or offered to assist, another person in committing unlicensed Nevada real estate activity. Respondent did not know that Jared Davis was performing licensed real estate activities in Nevada without authorization. Respondent was not fully informed of the extent to which Davis was independently engaging with the parties and progressing deals without Respondent's direct involvement. Respondent understood himself to be the licensed Nevada agent responsible for all Nevada transactions. The evidence demonstrates lack of knowledge, and the Division cannot satisfy its burden to prove knowing assistance or an offer to assist.

3. **THIRD DEFENSE: No Supervisory Duty or Authority.** Unlike a broker, a licensed salesperson has no statutory or regulatory duty to supervise other licensees or employees. *See* NRS 645.660(3) (imposing supervisory obligations on brokers, not salespersons); NAC 645.600 (establishing reasonable supervision standards for brokers). Respondent held only a salesperson license (S.0169792) during the relevant period and had no authority to supervise, discipline, hire, or terminate Jared Davis or any other person affiliated with SRS Real Estate Partners, LLC. Davis was employed at the corporate level and was not under Respondent's supervision or direction. The Division cannot impose upon a salesperson obligations that the Legislature and the Commission have assigned exclusively to brokers.

4. **FOURTH DEFENSE: No Strict Vicarious Liability / No Personal Culpability (Jones, Lowe, Soeller).** Nevada law does not impose strict vicarious liability upon licensees for the acts of corporate colleagues or employees. The Nevada Supreme Court requires independent proof of the licensee's own culpability, incompetence, or negligence before disciplinary action may be sustained. *Real Estate Div., Dep't of Commerce v. Jones*, 98 Nev. 260, 645 P.2d 1371 (1982); *Lowe v. State Dep't of Commerce, Real Estate Div.*, 89 Nev. 488, 515 P.2d 388 (1973); *State Dep't of Commerce, Real Estate Div. v. Soeller*, 98 Nev. 579, 656 P.2d 224 (1982). The Division has not and cannot establish that Respondent personally engaged in culpable, negligent, or incompetent conduct warranting discipline.

5. **FIFTH DEFENSE: Good Faith Reliance on Corporate Structure and Licensed Status.** Respondent acted in good faith reliance on the corporate structure of SRS Real Estate

8488 Rozita Lee Ave
Suite 400
Las Vegas, NV 89113

WOMBLE BOND DICKINSON

Partners, LLC, and his own status as the licensed Nevada salesperson responsible for Nevada transactions. Respondent understood that Davis, as an Arizona-licensed agent employed at the corporate level, would refer Nevada transactions to Respondent as the licensed Nevada agent. Respondent and Broker Lord had multiple conversations emphasizing that only licensed brokers could transact deals in Nevada. Respondent had every reason to believe, and did believe, that the compliance structure was being followed.

6. **SIXTH DEFENSE: Davis's Unilateral and Unauthorized Conduct / Deception.** Jared Davis acted unilaterally and without Respondent's knowledge, authorization, or cooperation in communicating with parties and performing activities on Nevada transactions. Respondent was not fully informed of the extent to which Davis was independently engaging with the parties. Davis's unauthorized conduct constitutes an intervening cause that severs any causal connection between Respondent's conduct and the alleged unlicensed activity. A licensee who is deceived by a colleague acting outside the scope of his authority cannot be held to have "knowingly assisted" the unauthorized conduct.

7. **SEVENTH DEFENSE: Cooperation with Investigation and Corrective Action.** Respondent cooperated fully with the Division's investigation from its inception. Respondent submitted sworn affidavits on September 6 and September 10, 2024 (NRED0116-0117; NRED0114-0115), promptly responding to the Division's inquiries. Respondent also responded to the Division's additional inquiries in April 2025, providing detailed information regarding commission allocations and transaction details. Upon learning of Davis's unauthorized communications regarding Nevada transactions, Respondent supported Broker Lord's direction to Davis to cease all activity. Respondent's full cooperation and support for corrective action demonstrate good faith and militate against the imposition of discipline.

8. **EIGHTH DEFENSE: No Causation or Nexus Between Respondent's Conduct and Alleged Unlicensed Activity.** The Division has failed to establish any causal nexus between any act or omission of Respondent and the alleged unlicensed activity of Jared Davis. Davis was employed by SRS Real Estate Partners, LLC at the corporate level, held an Arizona real estate license, operated from out of state, and communicated without Respondent's knowledge. No

WOMBLE BOND DICKINSON
8488 Rozita Lee Ave
Suite 400
Las Vegas, NV 89113

evidence connects Respondent's conduct to Davis's alleged performance of licensed activities in Nevada. Without such a nexus, discipline may not be imposed. *See Jones*, 98 Nev. at 260, 645 P.2d at 1371; *Soeller*, 98 Nev. at 579, 656 P.2d at 224.

9. **NINTH DEFENSE: Internal Accounting Labels, Referral Concepts, and Commission Allocations Do Not Establish Knowing Assistance.** The broker revenue summaries referenced in the Complaint identify Respondent with agent percentages and "Market Leader Approval" designations. These internal accounting and corporate designations were used for corporate overhead, commission tracking, and internal management purposes. They do not constitute evidence of knowing assistance or authorization of unlicensed activity, and the Division cannot impute knowledge or culpable intent from such internal corporate accounting labels. It is SRS's corporate policy that referring brokers may receive compensation based on a deal-by-deal negotiated amount, but the transaction is handled by a licensee for that state. The statutory question remains what conduct was performed, by whom, in what capacity, and with Respondent's knowledge. Labels and allocations alone do not prove the charged violations.

10. **TENTH DEFENSE: Due Process / Protected Property Interest (Nev. Const. Art. I, Sec. 8; NRS Chapter 233B).** Respondent holds a protected property interest in his professional real estate license(s). Disciplinary action that restricts, suspends, revokes, or conditions that license must comport with the due process protections of Article I, Section 8 of the Nevada Constitution and the Fourteenth Amendment to the United States Constitution. NRS Chapter 233B and NAC Chapter 645 impose procedural requirements upon the Division. To the extent any procedural requirement has not been satisfied, Respondent reserves the right to challenge the sufficiency of the proceedings.

11. **ELEVENTH DEFENSE: Burden of Proof Remains with the Division.** The Division bears the burden of proving each element of the charged violations by a preponderance of the evidence (or such higher standard as may apply). Respondent does not bear any burden to disprove the allegations. To the extent any allegation remains unproven, the Commission must find in Respondent's favor.

8488 Rozita Lee Ave
Suite 400
Las Vegas, NV 89113

WOMBLE BOND DICKINSON

12. **TWELFTH DEFENSE: No Prior Disciplinary History.** Respondent has no prior disciplinary history with the Nevada Real Estate Division or the Commission. The absence of prior discipline is a mitigating factor that should weigh against the imposition of any sanction.

13. **THIRTEENTH DEFENSE: Subsequent Licensure and Professional Development.** Since the events giving rise to this Complaint, Respondent has obtained a Nevada broker's license (B.1003241.LP) effective August 5, 2025, affiliated with SRS National Net Lease Group, LP. Respondent now functions independently as the responsible licensee for a separate investment-focused division. This advancement in licensure and operational independence demonstrates Respondent's commitment to compliance with Nevada licensing requirements and provides additional assurance against any recurrence of the issues identified in this Complaint.

14. **FOURTEENTH DEFENSE: Settlement Communications and Subsequent Remedial Measures.** To the extent the Division seeks to use settlement communications or offers of compromise to prove liability, fault, or the validity of the charged violations, Respondent objects under all applicable evidentiary protections, including NRS 48.105. To the extent the Division seeks to use subsequent remedial measures or corrective actions, Respondent denies that such measures are admissions of liability, fault, or violation, while reserving the right to rely on them for mitigation, good faith, compliance, and prospective public-protection purposes.

15. **FIFTEENTH DEFENSE: Proportionality and Excessive Penalty.** Even if the Commission were to find any violation (which Respondent denies), the discipline sought or potentially imposed must be proportionate to the conduct alleged and the evidence adduced. Given Respondent's lack of knowledge, his status as a salesperson with no supervisory authority, his cooperation with the investigation, prompt corrective action, the absence of prior discipline, and good faith, any penalty exceeding the minimum would be excessive, disproportionate, and an abuse of discretion. *See Lowe*, 89 Nev. at 488, 515 P.2d at 388.

16. **SIXTEENTH DEFENSE: Distinguishing *Department of Business and Industry, Real Estate Division v. Mansour*, 564 P.3d 449 (Nev. 2025).** To the extent the Division relies on *Mansour* for the proposition that assisting unlicensed activity is a basis for discipline, Respondent distinguishes that case. The Division must still prove that Respondent *knowingly* assisted Davis and

WOMBLE BOND DICKINSON
8488 Rozita Lee Ave
Suite 400
Las Vegas, NV 89113

personally committed the conduct alleged. The evidence here establishes the opposite: Respondent was not fully informed of Davis's unauthorized activities, had no supervisory authority over Davis, and took corrective action upon discovering Davis's unauthorized communications. *See also Hudler v. Anderson*, 125 Nev. 1045, 281 P.3d 1183 (2009) (capacity and specific conduct matter in evaluating unlicensed-activity allegations).

17. **SEVENTEENTH DEFENSE: Statutory and Regulatory Compliance With Licensing Structure.** Respondent was an active Nevada salesperson affiliated with SRS Real Estate Partners, LLC, and transaction documents identified Respondent as the Nevada licensee. Respondent's position is that the Nevada-side licensing structure existed and that any alleged unlicensed conduct by Davis occurred outside his knowledge and outside the compliance structure he understood to be controlling. Those facts support compliance with Nevada licensing obligations and defeat any claim that Respondent knowingly assisted a non-Nevada licensee in evading NRS Chapter 645.

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

PRAYER FOR RELIEF

WHEREFORE, Respondent Patrick Luther respectfully requests that the Commission:

1. Dismiss the Complaint and Notice of Hearing in its entirety with prejudice;

2. Enter findings that Respondent did not violate NRS 645.633(1)(c) pursuant to NRS 645.235(1)(b) as alleged in Violations 1 through 4;

3. Decline to impose any fine, suspension, revocation, denial of renewal, condition, or other discipline upon Respondent's license;

4. Decline to impose any investigative costs, attorney's fees, or other costs upon Respondent under NRS 622.400 or any other provision;

8488 Rozita Lee Ave
Suite 400
Las Vegas, NV 89113

WOMBLE BOND DICKINSON

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

Respectfully submitted,

Dated this 11th day of September, 2026.

WOMBLE BOND DICKINSON (US) LLP

By: */s/ John Evans Bragonje*

John Evans Bragonje, Bar No. 9519
John.Bragonje@wbd-us.com
8488 Rozita Lee Ave., Suite 400
Las Vegas, NV 89113
Tel.: 702.949.8200
Fax: 702.949.8398

Attorneys for Respondent Patrick Luther

WOMBLE BOND DICKINSON
8488 Rozita Lee Ave
Suite 400
Las Vegas, NV 89113

CERTIFICATE OF SERVICE

I hereby certify that on the September 11, 2026, I caused a true and correct copy of the foregoing **RESPONDENT PATRICK LUTHER'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
AReveyrand@red.nv.gov

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

WOMBLE BOND DICKINSON
8488 Rozita Lee Ave
Suite 400
Las Vegas, NV 89113