

1 **BEFORE THE REAL ESTATE COMMISSION**

2 **STATE OF NEVADA**

3 SHARATH CHANDRA, Administrator,
4 REAL ESTATE DIVISION, DEPARTMENT
5 OF BUSINESS AND INDUSTRY,
6 STATE OF NEVADA,

7 Petitioner,

8 vs.

9 IVAN ALARCON,
10 (BS.0143962, Active)

11 Respondent.

Case No. 2023-954

**OPPOSITION TO RESPONDENT'S
MOTION FOR PARTIAL SUMMARY
JUDGEMENT**

FILED

MAY 02 2024

REAL ESTATE COMMISSION

BY Kelly Valadez

12 The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY
13 OF THE STATE OF NEVADA ("Division"), by and through its attorneys of record, Aaron D. Ford,
14 Attorney General, and Christal P. Keegan, Deputy Attorney General, timely opposes Ivan Alarcon's
15 ("Respondent") Motion for Partial Summary Judgement filed May 1, 2024 pursuant to NAC 645.840(3).
16 Respondent's Motion plainly demonstrates disagreement between the parties over the genuine issues of
17 material facts regarding his felony conviction for attempted reckless driving as it relates to the practice
18 of the licensee, and/or his felony conviction is considered a crime of moral turpitude as it resulted in
19 substantial bodily harm to his passenger.

20 The Division's Complaint filed March 21, 2024, adequately alleges the legal and factual
21 sufficiency of its case in accordance with NRS 233B.121(2) such that summary judgment is
22 inappropriate. Since the Motion will be heard at the May 14-16, 2024 Commission meeting, the
23 Commission should proceed with hearing the case to review all facts in order to make its decision.

24 DATED this 2nd day of May 2024.

25 AARON D. FORD
26 Attorney General

27 By: epkeegan
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