

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,

Case No. 2024-660

7 Petitioner,

8 vs.

9 ANDREW J. AREVALO,
10 (S.0184627 - DENIED),

11 Respondent.

FILED

AUG 20 2025

REAL ESTATE COMMISSION
BY 

12 **FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER**

13 This matter came on for hearing before the Real Estate Commission, Department of Business and
14 Industry, State of Nevada (the "Commission"), during a regular agenda set for a three-day stack
15 commencing August 12, 2025 (the "Hearing"). Respondent Andrew J. Arevalo ("RESPONDENT")
16 appeared, with his counsel Chandon Spartacus Alexander (Bar No. 12033) with Spartacus Law Firm.
17 Christal Park Keegan, Esq., Deputy Attorney General with the Nevada Attorney General's Office,
18 appeared on behalf of the Real Estate Division of the Department of Business and Industry, State of
19 Nevada (the "Division").

20 The Commission heard preliminary matters on the pending motions. The Commission considered
21 the oral arguments presented and the filed documents. The Commission DENIED RESPONDENT'S
22 Motion to Stay and Continue, or in the Alternative to Dismiss, filed February 4, 2025, and also DENIED
23 RESPONDENT'S Motion to Dismiss First Amended Complaint, filed July 30, 2025. The Commission
24 GRANTED the Division's Motion in Limine to Limit Repetitious, Irrelevant and/or Immaterial
25 Witnesses and Similarly Exclude Evidence Otherwise Offered to Confuse the Issues and Waste Time,
26 filed April 16, 2025, and excluded Witness 2 Brooks Robinson, Esq. and Witness 3 Psychologist Mark
27 J. Chambers, Ph.D., and limited Respondent's three (3) character witnesses - Witness 4 Ciarra Craig,
28 Witness 5 Arnold Argao, and Witness 6 Broker Gavin Ernstone – to RESPONDENT'S choice of one

1 (1), to which RESPONDENT decided upon Witness 5 Arnold Argao. The Commission deferred
2 ruling on the RESPONDENT'S Exhibits AREVALO 00001-00030 and proceeded with hearing the
3 parties presentations.

4 After hearing the testimony presented in this matter and for good cause appearing, the
5 Commission now enters its Findings of Fact, Conclusions of Law, and Order against RESPONDENT
6 as follows:

7 JURISDICTION

8 RESPONDENT, at all relevant times mentioned in this Complaint, was actively licensed as a
9 salesperson (S.0184627). RESPONDENT is, therefore, subject to the jurisdiction of the Division and
10 the Commission, and the provisions of NRS Chapter 645 and NAC Chapter 645.

11 FINDINGS OF FACT

12 The Commission, based on the evidence presented during the Hearing, by unanimous vote enters
13 the finding of the following facts:

14 1. On or about July 3, 2023, the RESPONDENT committed assaults in acts of domestic
15 violence against his wife. *NRED 000015.*

16 2. On or about December 4, 2023, the RESPONDENT entered a plea of guilty to
17 Count One of Assault in the Second Degree, a Class F4 – As an Act of Domestic Violence.
18 *NRED 000028 – NRED 000029.*

19 3. The RESPONDENT was sentenced to two (2) years of supervised probation.
20 *NRED 000028.*

21 4. Thereafter, on or about April 11, 2024, RESPONDENT entered into a Stipulation for
22 Diversion with the Colorado Real Estate Commission. *NRED 000018 – NRED 000022.*

23 5. Wherein, the RESPONDENT admitted to violating §12-10-217(1)(n) C.R.S. as he was
24 convicted of or entered a plea of guilty or nolo contendere. *NRED 000018 – NRED 000019.*

25 6. The RESPONDENT accepted the administrative fine and his Colorado real estate
26 license was placed on probation for a period to run concurrent with the term of his sentencing in
27 Case No. 2023CR700. *NRED 000019 – NRED 000020.*

28 ...

7. But it was not until July 16, 2024, that the Division received RESPONDENT'S self-report letter dated June 26, 2024. *NRED 000015*.

8. Accordingly, on July 18, 2024, the Division sent the RESPONDENT its opening investigation letter. *NRED 000008*.

9. Thereafter, on or about September 12, 2024, the Division informed the RESPONDENT it would proceed formally against him. *NRED 000009 – NRED 000013.*

10. On October 1, 2024, the Division filed a formal Complaint against RESPONDENT wherefrom the case was continued many times. *NRED 000049 – NRED 000053.*

11. During the continuances, RESPONDENT'S license S.0184627 came up for renewal in April of 2025. *NRED 000054*.

12. Upon Question No. 10 of the April 2025 renewal application, RESPONDENT reported “No” to having any disciplinary sanctions imposed by any real estate regulatory agency or commission since the last renewal, despite the April 11, 2024 Order for Stipulation before the Colorado Real Estate Commission. *NRED 000056*.

13. Upon Question No. 11 of the April 2025 renewal application, RESPONDENT reported “No” to having ever been convicted of, or entered a plea of guilty, guilty but mentally ill or nolo contendere to a misdemeanor, gross misdemeanor, or felony since the last renewal, despite his self-report filed with the Division July 16, 2024. *NRED 000056*.

CONCLUSIONS OF LAW

Whereas the Commission found that the Division proved by a preponderance of the evidence the foregoing findings of fact, and by unanimous vote concludes that the RESPONDENT committed the following violations of law, as presented in the First Amended Complaint:

1. RESPONDENT violated NRS 645.330(1) pursuant to NRS 645.330(2)(b)(2) for failing to demonstrate the general qualifications required of a Nevada real estate licensee as he is still serving his probation until December of 2025.

2. RESPONDENT violated NRS 645.633(1)(d)(2) for the entry of a plea of guilty to a crime involving moral turpitude for the domestic violence offense(s).

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3. RESPONDENT violated NRS 645.615(2) for failing to timely submit notification to the Division of his entry of guilty plea on or about December 4, 2023.

4. RESPONDENT violated NRS 645.330(1)(b) on TWO COUNTS:

a. COUNT ONE for committing false reporting of material fact on his license renewal application regarding disciplinary sanctions imposed by the Colorado real estate regulatory agency; and

b. COUNT TWO for committing false reporting of material fact on his license renewal application regarding the entered plea of guilty, which, in itself, is sufficient grounds for refusal of a license NRS 645.440.

ORDER

The Commission, being fully apprised in the premises, and good cause appearing to the Commission, and by unanimous vote, ORDERS as follows:

1. RESPONDENT shall pay an administrative fine to the Division in the total amount of Fifteen Thousand Four Hundred Seventy-Three Dollars and Sixty-Seven Cents (\$15,473.67) ("Amount Due"), which includes a fine of Two Hundred Fifty Dollars (\$250.00) for violations of law and Fifteen Thousand Two Hundred Twenty -Three Dollars and Sixty-Seven Cents (\$15,223.67) for the Division's costs and attorney's fees, within thirty (30) days from the effective date of this Order.

2. RESPONDENT'S salesperson license (S.0184627) renewal shall be DENIED, and RESPONDENT is prohibited from reapplying for three (3) years after the expiration of the period of his probation.

3. If payment is not actually received by the Division on or before its due date, it shall be a default by RESPONDENT. In the event of default, the unpaid balance of the administrative fine and costs, together with any attorney's fees and costs that may have been assessed, shall be due in full to the Division within ten (10) calendar days of the date of default, and the Division may obtain a judgment for the amount owed, including collection fees and costs.

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4. The Commission retains jurisdiction for correcting any errors that may have occurred in the drafting and issuance of this document.

5. This Order shall become effective thirty (30) days after the date of this Order.

DATED this 20th day of August, 2025.

NEVADA REAL ESTATE COMMISSION

By: Darrell Plummer
President, Darrell Plummer

DATED this 13th day of August, 2025.

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NRS 233B.130 Judicial review; requirements for petition and cross-petition; statement of intent to participate; petition for rehearing or reconsideration; service; dismissal of certain agencies and persons from proceedings concerning final decision of State Contractors' Board; exclusive means.

1. Any party who is:

(a) Identified as a party of record by an agency in an administrative proceeding; and

(b) Aggrieved by a final decision in a contested case,

is entitled to judicial review of the decision. Where appeal is provided within an agency, only the decision at the highest level is reviewable unless a decision made at a lower level in the agency is made final by statute. Any preliminary, procedural or intermediate act or ruling by an agency in a contested case is reviewable if review of the final decision of the agency would not provide an adequate remedy.

2. Petitions for judicial review must:

(a) Name as respondents the agency and all parties of record to the administrative proceeding;

(b) Be instituted by filing a petition in the district court in and for Carson City, in and for the county in which the aggrieved party resides or in and for the county where the agency proceeding occurred;

(c) Be served upon:

(1) The Attorney General, or a person designated by the Attorney General, at the Office of the Attorney General in Carson City; and

(2) The person serving in the office of administrative head of the named agency; and

(d) Be filed within 30 days after service of the final decision of the agency.

Cross-petitions for judicial review must be filed within 10 days after service of a petition for judicial review.

3. The agency and any party desiring to participate in the judicial review must file a statement of intent to participate in the petition for judicial review and serve the statement upon the agency and every party within 20 days after service of the petition.

4. A petition for rehearing or reconsideration must be filed within 15 days after the date of service of the final decision. An order granting or denying the petition must be served on all parties at least 5 days before the expiration of the time for filing the petition for judicial review. If the petition is granted, the subsequent order shall be deemed the final order for the purpose of judicial review.

5. The petition for judicial review and any cross-petitions for judicial review must be served upon the agency and every party within 45 days after the filing of the petition, unless, upon a showing of good cause, the district court extends the time for such service. If the proceeding involves a petition for judicial review or cross-petition for judicial review of a final decision of the State Contractors' Board, the district court may, on its own motion or the motion of a party, dismiss from the proceeding any agency or person who:

(a) Is named as a party in the petition for judicial review or cross-petition for judicial review; and

(b) Was not a party to the administrative proceeding for which the petition for judicial review or cross-petition for judicial review was filed.

6. The provisions of this chapter are the exclusive means of judicial review of, or judicial action concerning, a final decision in a contested case involving an agency to which this chapter applies.