

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 ANDREW J. AREVALO,
10 (S.0184627)

11 Respondent.

Case No. 2024-660

FILED

MAY 16 2025

REAL ESTATE COMMISSION

BY 

12 **FIRST AMENDED COMPLAINT AND NOTICE OF HEARING**

13 The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY
14 OF THE STATE OF NEVADA ("Division") hereby notifies RESPONDENT ANDREW J. AREVALO
15 ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL ESTATE
16 COMMISSION ("Commission") upon its First Amended Complaint as permitted by NAC 645.835. The
17 hearing will be held pursuant to Chapters 233B and Chapter 645 of the Nevada Revised Statutes ("NRS")
18 and Chapter 645 of the Nevada Administrative Code ("NAC"). The purpose of the hearing is to consider
19 the allegations stated below and to determine if the RESPONDENT should be subject to an administrative
20 penalty as set forth in NRS 645.630, NRS 645.633 and/or NRS 622.400, and the discipline to be imposed,
21 if violations of law are proven.

22 **JURISDICTION**

23 RESPONDENT, at all relevant times mentioned in this Complaint, was actively licensed as a
24 salesperson (S.0184627). RESPONDENT is, therefore, subject to the jurisdiction of the Division and
25 the Commission, and the provisions of NRS Chapter 645 and NAC Chapter 645. As of the date of this
26 First Amended Complaint, RESPONDENT'S salesperson's license is currently in "active" status upon
27 effective renewal May 1, 2025.

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1 **FACTUAL ALLEGATIONS**

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

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

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

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

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

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

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

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

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

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

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

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

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

7 VIOLATIONS OF LAW

8 RESPONDENT committed the following violations of law:

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

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

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

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

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

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

23 DISCIPLINE AUTHORIZED

24 5. Pursuant to NRS 645.630 and NRS 645.633, the Commission is empowered to impose an
25 administrative fine per violation against RESPONDENT that may not exceed \$10,000, and further to
26 suspend, revoke, or place conditions on the license of RESPONDENT.

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6. 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.

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

NOTICE OF HEARING

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

THE HEARING WILL TAKE PLACE on August 12, 2025, commencing at 9:00 a.m., or as soon thereafter as the Commission is able to hear the matter, and each day thereafter commencing at 9:00 a.m. through August 14, 2025, or earlier if the business of the Commission is concluded. The Commission meeting will be held on August 12, 2025, at the Nevada Division of Insurance, 1818 E. College Parkway, Suite 103, Carson City, Nevada 89706, with video conference to the Nevada State Business Center, 3300 West Sahara Avenue, 4th Floor, Nevada Room, Las Vegas, Nevada 89102. The meeting will continue on each day thereafter commencing at 9:00 a.m. through August 14, 2025, until the business of the Commission is concluded.

STACKED CALENDAR: Your hearing is one of several hearings scheduled at the same time as part of a regular meeting of the Commission that is expected to last from August 12, 2025 through August 14, 2025, or earlier if the business of the Commission is concluded. Thus, your hearing may be continued until later in the day or from day to day. It is your responsibility to be present when your case is called. If you are not present when your hearing is called, a default may be entered against you and the Commission may decide the case as if all allegations in the First Amended Complaint were true. If you have any questions, please call Shareece Bates, Acting Commission Coordinator, at (702) 486-4036.

YOUR RIGHTS AT THE HEARING: except as mentioned below, the hearing is an open meeting under Nevada's Open Meeting Law, and may be attended by the public. After the evidence and arguments, the Commission may conduct a closed meeting to discuss your alleged misconduct or

1 professional competence. You are entitled to a copy of the transcript of the open and closed portions of
2 the meeting, although you must pay for the transcription.

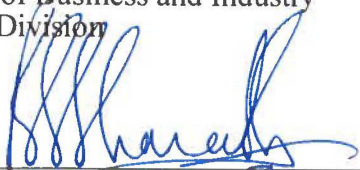
3 As the RESPONDENT, you are specifically informed that you have the right to appear and be
4 heard in your defense, either personally or through your counsel of choice. At the hearing, the Division
5 has the burden of proving the allegations in the First Amended Complaint and will call witnesses and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

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

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


17
18 DATED this 16 day of May, 2025.

19 STATE OF NEVADA
20 Department of Business and Industry
Real Estate Division

21
22 By: 
23 SHARATH CHANDRA, Administrator
3300 West Sahara Avenue, Suite 350
24 Las Vegas, Nevada 89102

DATED this 14th day of May, 2025.

AARON D. FORD
Attorney General

25 By: 
26 CHRISTAL P. KEEGAN (Bar No. 12725)
27 Deputy Attorney General
5420 Kietzke Lane, Suite 202
28 Reno, Nevada 89511
(775) 687-2141
ckeegan@ag.nv.gov

Attorney for Real Estate Division