

FILED

From: [Chandon Alexander](#)
To: [Christal P. Keegan](#); [Ray Mercado](#); [Whipple, Bret](#)
Subject: Re: FW: 1st Amended Complaint re: 2024-660 Arevalo / Pre-hearing Disclosures
Date: Tuesday, May 27, 2025 3:32:36 PM

MAY 28 2025
REAL ESTATE COMMISSION
BY 

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Ms. Keegan:

Be advised that I am indeed counsel for Mr. Arevalo, and this correspondence serves as a continued confirmation of my representation, of which you are well aware. Regarding your suggestion to notify additional parties of my appearance in this matter, you are welcome to undertake that action at your discretion, you do not direct me, let's make that clear.

Sincerely,

Chandon Alexander, Esq.

On Tue, May 27, 2025 at 3:20 PM Christal P. Keegan <ckeegan@ag.nv.gov> wrote:

Hi, Attorney Alexander:

The substitution of attorneys filed May 12, 2025 with Attorney Whipple replacing you in case no. 2024-660 does not limit representation to the May 13-15, 2025 hearings that were temporarily stayed (see attached). Please notify the Division ASAP if you are re-entering the case as alleged by Attorney Whipple, with notice sent to the Division's Amy Reveyrand Reveyrand@red.nv.gov, with copy to Shareece Bates Administration Section Manager sbates@red.nv.gov, and myself as Division's counsel, please.

I am also re-attaching our First Amended Complaint filed May 16, 2025 amending our charges to include your client's false reporting on his April 2025 real estate salesperson license renewal (S.0184627), as well as the corresponding notices, and Division's Exhibits bated stamped NRED 000001-000056 are attached here as well, since you've claimed you use a "multiperson office" (see Petitioner's Motion to Strike and Preclude Respondent's Unidentified and Undisclosed "Video Evidence" and to Strike Respondents' "Answer in Support of Commission" Case No. A-25-917222-W, filed May 2, 2025, the hearing for which was vacated since the district court denied your Petition for Writ of Mandamus on May 6, 2025). If the Division should be sending you certified mailings to an address different than the one it has on record (which the Division has been using the same address as on your pleadings and email signature blocks 400 South Seventh Street, Suite 100, Las Vegas, Nevada 89101) then please update that information ASAP for purposes of certified mailings pursuant to NRS 233B.125, NRS 645.680. NRS 645.740.

Thank you,

Christal

Christal Park Keegan, Esq.
Deputy Attorney General

State of Nevada
Office of the Attorney General
Department of Business & Industry
Real Estate Division
5420 Kietzke Lane #202
Reno, Nevada 89511

E: ckeegan@ag.nv.gov | T: 775.687.2141



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From: Bret Whipple <bretwhipple@gmail.com>
Sent: Tuesday, May 27, 2025 2:51 PM
To: Christal P. Keegan <ckeegan@ag.nv.gov>
Cc: chandon@spartacuslawfirm.com

Subject: Re: 1st Amended Complaint re: 2024-660 Arevalo / Pre-hearing Disclosures

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Christal-

Mr. Arevalo hired me to handle the matter because his previous attorney, Chandon Alexander, was in trial on the date the hearing was supposed to go forward. However, as you know, a stay was granted which necessitated rescheduling the hearing. As such, Mr. Arevalo has opted to have Mr. Alexander re-enter the case. Please forward all correspondence and information to him directly. Thank you.

Bret Whipple

JUSTICE LAW CENTER

On Tue, May 27, 2025 at 9:41 AM Christal P. Keegan <ckeegan@ag.nv.gov> wrote:

Hi, Attorney Whipple:

As you know, on May 12, 2025, you notified me of your substitution of counsel of Respondent Andrew Arevalo in Case No. 2024-660. On May 20, 2025, we filed our First Amended Complaint, amending our charges to include your client's false reporting on his April 2025 real estate salesperson license renewal (S.0184627). Although USPS demonstrates delivery, for your convenience, the First Amended Complaint, corresponding notices, and Division's Exhibits are stamped *NRED 000001-000056* are attached here as well.

This matter shall be heard at the Commission Hearings August 12-14, 2025, in Carson City, with virtual attendance options available.

The State intends to call Investigator Shannon Goddard as the Division's witness. Pursuant to NAC 645.850, please ensure to inform me of any documents or witnesses you intend to use or call, respectively, that have not already been previously disclosed during the course of this case. If you need the documents filed in this case, you can reach out to the Division's Commission Coordinator and request that from: Amy Reveyrand Reveyrand@red.nv.gov, with copy to Shareece Bates Administration Section Manager sbates@red.nv.gov, and myself as Division's counsel, please.

Thank you,

Christal

Christal Park Keegan, Esq.

Deputy Attorney General

State of Nevada

Office of the Attorney General

Department of Business & Industry

Real Estate Division

5420 Kietzke Lane #202

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