

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
8
9
10 Petitioner,

vs.

11 ANDREW J. AREVALO,
12 (S.0184627)

Respondent.

FILED

AUG 04 2025

REAL ESTATE COMMISSION

BY 

13 **SUBMISSION OF PRE-HEARING ATTORNEY FEES**
14 **PURSUANT TO NRS 622.400 AND BRUNZELL FACTORS**

15 The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY
16 OF THE STATE OF NEVADA ("Division"), by and through its attorneys of record, Aaron D. Ford,
17 Attorney General, and Christal P. Keegan, Deputy Attorney General, presents its Submission of
18 Pre-Hearing Attorney Fees Pursuant to NRS 622.400 and the Brunzell Factors¹.

DATED this 4th day of August 2025.

AARON D. FORD
Attorney General

19
20 By: 
21 CHRISTAL P. KEEGAN, ESQ.
22 Deputy Attorney General
23 Nevada Bar No. 12725
24 5420 Kietzke Lane, Suite 202
25 Reno, Nevada 89511
26 (775) 687-2141
27 ckeegan@ag.nv.gov

Attorney for Real Estate Division

28 ¹ *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 455 P.2d 31 (1969) to demonstrate the
Division's counsel's fees are reasonable and justified.

EXHIBIT 1

EXHIBIT 1

1 **NRS 622.400 AND BRUNZELL AFFIDAVIT OF**
2 **CHRISTAL P. KEEGAN, ESQ. IN SUPPORT OF ATTORNEY'S FEES**

3 BEFORE ME, the undersigned authority, personally appeared Christal P. Keegan,
4 who, upon being duly sworn, does hereby state that the following assertions are true to the
5 best of her knowledge and belief:

6 1. Affiant is an attorney duly licensed to practice law in the State of Nevada,
7 and is a Deputy Attorney General ("DAG") with the Nevada Attorney General's Office
8 ("AGO"), representing the Nevada Real Estate Division (the "Division"), and is the
9 counsel of record for the Division in the administrative disciplinary Case No. 2024-660
10 against Respondent Andrew J. Arevalo ("Arevalo") before the Nevada Real Estate
11 Commission ("Commission").

12 2. Affiant has been a licensed attorney in good standing (NV Bar No. 12725)
13 with an impeccable record with the State Bar of Nevada for over 12 years since her
14 admittance on October 3, 2012, and successfully tried cases before the Nevada Real Estate
15 Commission, and in appeals to the Second and Eighth Judicial District Courts and Nevada
16 Appellate Courts.

17 3. Affiant has experience working and litigating a variety of real estate
18 cases before the respective commissions, including against, real estate licensees,
19 common-interest ownerships and community managers, and appraisers and appraisal
20 management companies.

21 4. Since Affiant's start at the AGO's on December 19, 2022, she has a high
22 success rate in cases presented to the Commission.

23 5. Affiant is the lead and sole counsel for the Division, in this case, and
24 anticipates obtaining a favorable decision in front of the Commission during its hearings
25 August 12-14, 2025.

26 6. The character of and the reasons underlying the work done was significant.
27 Initially, the case was straightforward, and the work involved reviewing the Division's
28 investigative file comprised of 48 pages, drafting the complaint, corresponding notices and

1 designating the appropriate exhibits. The work also involved settlement efforts which
2 Arevalo decidedly rejected. But the work performed by the Affiant became more involved
3 in responding to Arevalo's numerous motions, continuance requests and ensuring the
4 Commission had accurate and reliable information before it. The work involved amending
5 its complaint for new violations that arose during Arevalo's license renewal April 2025, to
6 include amending the corresponding notices and designating the appropriate additional
7 exhibits. The work involved hearing preparation for various aspects of the case, including
8 opening statements, witness examinations, adverse examination of the Arevalo's six
9 witnesses, preparing responses to anticipated evidentiary objections, and closing
10 statements. The work involved being lead counsel and directing the prosecution and
11 presentation of the case, as well as the entire case, from start to finish.

12 7. The importance of this case should not be overlooked, as it involves a
13 salesperson's mandatory reporting requirements and his failure to demonstrate the general
14 qualifications required of a Nevada real estate licensee, which violate real estate
15 professional standards, and is a safeguard in the interests of the public.

16 8. As a result, the time spent by the Affiant was justified and reasonable, and
17 Affiant verifies the accuracy of the Hearing Costs Invoice. **Exhibit 2.**

18 9. Affiant's hourly rate for DAGs as approved during the legislative session for
19 2024-2025 went into effect July 1, 2023 at a rate of \$157.04 per hour.

20 10. Affiant is requesting the hourly rate for DAGs of \$157.04 per hour for the
21 90 hours of pre-hearing time spent (\$14,133.60), and for the actual hearing hours spent as
22 shall be determined.

23 11. The aforementioned time spent in this case, and contained in **Exhibit 2**, were
24 actually, reasonably, and necessarily incurred.

25 ...

26 ...

27 ...

28 ...

12. The aforementioned total costs in this matter pursuant to NRS 622.400, and contained in **Exhibit 2**, were actually and necessarily incurred, and were reasonable.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 4th day of August 2025.

AARON D. FORD
Attorney General

By:

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

Attorney for Real Estate Division

ACKNOWLEDGEMENT

STATE OF RENO)

COUNTY OF WASHOE)

On this 4th day of August 2025, personally appeared before me,
Christal P. Keegan, personally known to me or proved on the basis
of satisfactory evidence to be the person whose signature is affixed to the foregoing Consent
to Order, who acknowledged to me that he/she/they executed the same freely and
voluntarily and for the uses and purposes therein described.

Toni McKenzie
NOTARY PUBLIC in and for
said County and State.

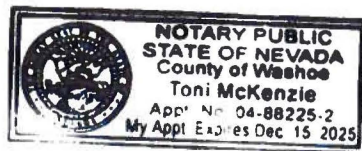


EXHIBIT 2

EXHIBIT 2

Arevalo | Case No. 2024-660
DAG Pre-Hearing Attorney Fees

Date	Description	Time	Rate (\$157.04/hr.)
09/23/2024	Review file; draft complaint; Research NRS/NAC 645 violations, moral turpitude. Prepare corresponding notices; prepare exhibits pp. 1-48. Finalize; file.	8.00	\$1,256.32
09/25/2024	Confirm out of state addresses. Finalize; file.	1.00	\$157.04
10/07/2024	Client Communications re Settlement.	1.00	\$157.04
10/11/2024	Confirm USPS Tracking; Draft Introductions to Respondent.	1.00	\$157.04
10/16/2024	Telephone call with Respondent; Draft summary email; transmit settlement terms. Email Introductions to Retained Attorney; Prehearing witness disclosures.	3.00	\$471.12
10/17/2024	Review notice of intent to request continuance; Draft response.	0.50	\$78.52
10/31/2024	Review Answer, Notice of Representation and Request for Continuance.	3.00	\$471.12
11/04/2024	Review Decision on Continuance Request.	--	--
01/02/2025	Review Meeting Re-notices.	0.50	\$78.52
01/30/2025	Prepare and filed Appendix of Relevant laws.	0.50	\$78.52
02/04/2025	Review Respondent's Motion to Stay and Continue or in the Alternative Dismiss, with Exhibits A&B; Research case law and relevant laws.	1.00	\$157.04
02/05/2025	Draft Opposition to Motion to Stay, prepare Exhibits A-G.	2.00	\$314.08
02/06/2025	Review Respondent's Prehearing Statement with Exhibits A-J; and Reply to Opposition to Respondent's Motion to Stay.	5.50	\$863.72
02/07/2025	Prepare prehearing hours; Witness preparations; Prehearing preparations.	4.00	\$628.16
02/12/2025	Case 2024-660 Called, respond to second request for continuance. Draft Order.	1.00	\$157.04
04/03/2025	Draft Supplement to Opposition to Respondent's Motion to Stay, prepare Exhibits A.	1.00	\$157.04
04/07/2025	Review witness disclosures, draft email to opposing counsel requesting reconsideration with deadline to respond by April 11, 2025.	1.00	\$157.04
04/11/2025	Review Respondent's Motion to Continue the Administrative Trial. Research case law.	4.00	\$628.16

Arevalo | Case No. 2024-660
DAG Pre-Hearing Attorney Fees

04/14/2025	Review Commission's Denial Decision.	--	--
04/15/2025	Draft Opposition to Respondent's Motion to Continue in Support of the Commission's Decision, prepare Exhibits A-D.	2.00	\$314.08
05/02/2025	Review Respondent's Opposition to Motion in Limine.	1.00	\$157.04
05/09/2025	Draft Witness cross-examination questions; Hearing preparations.	5.00	\$785.20
05/10/2025	Prehearing preparations.	5.00	\$785.20
05/12/2025	Prehearing preparations; Telephone call with Bret O. Whipple, Review substitution of counsel; Review Nevada Court of Appeals Case 90605-COA Order issuing Temporary Stay.	5.00	\$785.20
05/13/2025	Appearance and presentation to the Commission at Hearing; Draft Order.	1.00	\$157.04
05/16/2025	Draft First Amended Complaint, corresponding notices; Prepare exhibits pp. 1-56. Finalize; file.	4.00	\$628.16
05/27/2025	Review status of certificate of service; Draft communications with Attorneys Whipple and Alexander regarding representation of Respondent; Advise Division staff.	1.00	\$157.04
06/16/2025	Review Answer to First Amended Complaint.	1.00	\$157.04
07/21/2025	Review Orders, and draft Notice of Orders Denying Writ Petitions, prepare Exhibits 1 and 2; Draft correspondence transmitting copy to opposing counsel and requesting intended means of appearances.	1.00	\$157.04
07/29/2025 – 07/30/2025	Review Respondent's Motion to Dismiss First Amended Complaint; Confidential client communications; Amend prehearing witness disclosures to opposing counsel.	8.00	\$1,256.32
08/01/2025 – 08/02/2025, 08/04/2025	Research NRS 645.680, NRS 645.330, 645.630, 645.633, NRS 645.050, NRS 622.400, NAC 645.840, NAC 645.835, NRCP Rule 12(b), research rebuttal case law; Draft Opposition to Motion to Dismiss; Draft Prehearing Attorney Fees with Exhibits 1 and 2; Draft added witness questions for licensing manager.	18.00	\$2,826.72
	TOTAL	90.00	\$14,133.60