1	<b>BEFORE THE REAL ESTATE COMMISSION</b>	
2	STATE OF NEVADA	
3	SHARATH CHANDRA, Administrator,	
4	REAL ESTATE DIVISION, DEPARTMENT OF BUSINESS AND INDUSTRY, STATE OF NEVADA,	Case No. 2024-660
5	Petitioner,	
6	VS.	FILED
7	ANDREW J. AREVALO,	OCT 0 1 2024
8	(S.0184627)	REAL ESTATE COMMISSION BY Keeley Valader
9	Respondent.	0
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11	COMPLAINT AND NOTICE OF HEARING	
12	The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY	
13	OF THE STATE OF NEVADA ("Division") hereby notifies RESPONDENT ANDREW J. AREVALO	
14	("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL ESTATE	
15	COMMISSION ("Commission"). The hearing will be held pursuant to Chapters 233B and Chapter 645	
16	of the Nevada Revised Statutes ("NRS") and Chapter 645 of the Nevada Administrative Code ("NAC").	
17	The purpose of the hearing is to consider the allegations stated below and to determine if the	
18	RESPONDENT should be subject to an administrative penalty as set forth in NRS 645.630 and/or	
19	NRS 622.400, and the discipline to be imposed, if violations of law are proven.	
20	JURISDICTION	
21	RESPONDENT, at all relevant times mentioned in this Complaint, was actively licensed as a	
22	salesperson (S.0184627). RESPONDENT is, therefore, subject to the jurisdiction of the Division and	
23	the Commission, and the provisions of NRS Chapter 645 and NAC Chapter 645. As of the date of this	
24	Complaint, RESPONDENT'S salesperson's license is currently in "active" status.	
25	FACTUAL ALLEGATIONS	
26	1. On or about July 3, 2023, the RE	SPONDENT committed assaults in acts of domestic
27	violence against his wife. NRED 000015.	
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On or about December 4, 2023, the RESPONDENT entered a plea of guilty to Count 2. 1 One of Assault in the Second Degree, a Class F4 - As an Act of Domestic Violence. NRED 000028 -2 3 NRED 000029. The RESPONDENT was sentenced to two (2) years of supervised probation. 3. 4 NRED 000028. 5 Thereafter, on or about April 11, 2024, RESPONDENT entered into a Stipulation for 6 4. Diversion with the Colorado Real Estate Commission. NRED 000018 - NRED 000022. 7 Wherein, the RESPONDENT admitted to the violating §12-10-217(1)(n) C.R.S. as he was 8 5. convicted of or entered a plea of guilty or nolo contendere. NRED 000018 - NRED 000019. 9 The RESPONDENT accepted the administrative fine and his Colorado real estate license 10 6. was placed on probation for a period to run concurrent with the term of his sentencing in Case No. 11 12 2023CR700. NRED 000019 - NRED 000020. But it was not until July 16, 2024, that the Division received RESPONDENT'S self-report 13 7. letter dated June 26, 2024. NRED 000015. 14 Accordingly, on July 18, 2024, the Division sent the RESPONDENT its opening 8. 15 16 investigation letter. NRED 000008. Thereafter, on or about September 12, 2024, the Division informed the RESPONDENT it 17 9. would proceed formally against him. NRED 000009 - NRED 000013. 18 **VIOLATIONS OF LAW** 19 **RESPONDENT** committed the following violations of law: 20RESPONDENT violated NRS 645.330(1) pursuant to NRS 645.330(2)(b)(2) for failing 211. to demonstrate the general qualifications required of a Nevada real estate licensee as he is still serving 22 23 his probation until December of 2025. RESPONDENT violated NRS 645.633(1)(d)(2) for the entry of a plea of guilty to a crime 2. 24involving moral turpitude for the domestic violence offense(s). 25RESPONDENT violated NRS 645.615(2) for failing to timely submit notification to the 263. Division of his entry of guilty plea on or about December 4, 2023. 27 28. . . Page 2 of 5

1	DISCIPLINE AUTHORIZED		
2	4. Pursuant to NRS 645.630 and NRS 645.633, the Commission is empowered to impose an		
3	administrative fine per violation against RESPONDENT that may not exceed \$10,000, and further		
4	suspend, revoke, or place conditions on the license of RESPONDENT.		
5	5. Additionally, under NRS 622.400, the Commission is authorized to impose costs of the		
6	proceeding upon RESPONDENT, including investigative costs and attorney's fees, if the Commission		
7	otherwise imposes discipline on RESPONDENT.		
8	6. Therefore, the Division requests that the Commission take such disciplinary action as it		
9	deems appropriate under the circumstances.		
10	NOTICE OF HEARING		
11	PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider the Administrative		
12	Complaint against the above-named RESPONDENT in accordance with Chapters 233B and 645 of th		
13	Nevada Revised Statutes and Chapter 645 of the Nevada Administrative Code.		
14	THE HEARING WILL TAKE PLACE on November 19, 2024, commencing at 9:00 a.m.		
15	or as soon thereafter as the Commission is able to hear the matter, and each day thereafter		
16	commencing at 9:00 a.m. through November 21, 2024, or earlier if the business of the Commission		
17	is concluded. The Commission meeting will be held on November 19, 2024, at the Nevada State		
18	Business Center, 3300 W. Sahara Avenue, 4th Floor – Nevada Room, Las Vegas, Nevada 89102		
19	with video conferencing to the Nevada Division of Insurance, 1818 E. College Parkway, Suite 103		
20	Carson City, Nevada 89706. The meeting will continue on each day thereafter commencing at 9:00		
21	a.m. through November 21, 2024, until the business of the Commission is concluded.		
22	STACKED CALENDAR: Your hearing is one of several hearings scheduled at the same		
23	time as part of a regular meeting of the Commission that is expected to last from November 19,		
24	2024 through November 21, 2024, or earlier if the business of the Commission is concluded. Thus		
25	your hearing may be continued until later in the day or from day to day. It is your responsibility		
26	to be present when your case is called. If you are not present when your hearing is called, a default		
27	may be entered against you and the Commission may decide the case as if all allegations in the		
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complaint were true. If you have any questions, please call Kelly Valadez, Commission
 Coordinator, at (702) 486-4606.

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

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

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

The purpose of the hearing is to determine if the RESPONDENT has violated NRS 645 and/or NAC 645 and if the allegations contained herein are substantially proven by the evidence presented and ....

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1	to further determine what administrative penalty is to be assessed against the RESPONDENT, if any,	
2	pursuant to 645.633 and or 645.630.	
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4	DATED this $30$ day of September, 2024.	DATED this 27th day of September, 2024.
5	STATE OF NEVADA Department of Business and Industry	AARON D. FORD Attorney General
6	Real Estate Division	Automoy Souchar
7		,
8	By:	By: CHRISTAL P. KEEGAN (Bar No. 12725)
9	3300 West Sahara Avenue, Suite 350 Las Vegas, Nevada 89102	Deputy Attorney General 5420 Kietzke Lane, Suite 202
10 11		Reno, Nevada 89511 (775) 687-2141 ckeegan@ag.nv.gov
12		Attorney for Real Estate Division
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