

**FILED**

FEB 06 2025

REAL ESTATE COMMISSION

BY Kelly Valadez

1 Chandon S. Alexander, Esq.  
Nevada Bar No. 12033  
2 **SPARTACUS LAW FIRM**  
400 South Seventh Street, Suite 100  
3 Las Vegas, Nevada 89101  
4 Tel: (702) 660-1234  
5 Fax: (702) 441-1626  
*Attorney for Respondent*

**BEFORE THE REAL ESTATE COMMISSION**

**STATE OF NEVADA**

8 SHARATH CHANDRA, Administrator,  
9 REAL ESTATE DIVISION, DEPARTMENT  
10 OF BUSINESS AND INDUSTRY, STATE  
OF NEVADA,

Petitioner,

vs.

14 ANDREW J. AREVALO,  
(S.0184627)

Respondent.

Case No.: 2024-660

**RESPONDENT'S PREHEARING STATEMENT**

**SPARTACUS LAW FIRM**  
2777 Paradise Road, Suite 3002  
Las Vegas, Nevada 89109  
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18 COMES NOW, Respondent ANDREW J. AREVALO ("Respondent"), by and through  
19 his undersigned counsel of record, Chandon S. Alexander, Esq., of the SPARTACUS LAW  
20 FIRM and submits his Prehearing Statement as follows:

**LIST OF WITNESSES:**

- 21  
22 1. **ANDREW J. AREVALO**, Respondent, is expected to testify regarding the  
23 circumstances of his Colorado criminal case, his compliance with probation  
24 requirements, completion of domestic violence treatment, and his continued fitness to  
25 maintain his real estate license;  
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2. **BROOKS ROBINSON, ESQ.**, Law Office of McCormick, Kennedy & Robinson, PC, 507 Canyon Blvd., Suite 105, Boulder, CO 80302, 303.402.0222, is expected to testify regarding his representation of Respondent in the Colorado criminal matter and the terms and anticipated dismissal of charges under the Deferred Judgment agreement;
3. **MARK J. CHAMBERS, Ph.D.** – psychologist who is expected to testify as to the results of his forensic psychological examination of Mr. Arevalo.
4. **CIARRA CRAIG** – (702) 275-8190, a real estate agent who is expected to testify as to Mr. Arevalo’s professional real estate credentials.
5. **ARNOLD ARGAO** – (669) 258-7366, a real estate client of Mr. Arevalo who is expected to testify regarding Mr. Arevalo’s professionalism and interaction during prior real estate transaction.
6. **SANDY CORRIGAN** – (303) 907-1010, a former real estate agent and former mother-in-law of Mr. Arevalo, who is expected to testify as to Mr. Arevalo’s character.
7. Respondent reserves the right to call any witness listed by Petitioner in rebuttal.
8. Respondent reserves the right to amend and supplement this list as required in defense of the Complaint.

**LIST OF EXHIBITS:**

1. **EXHIBIT A – NRED000001-000048** produced by Petitioner;
2. **EXHIBIT B – Biopsychosocial Assessment of Mr. Arevalo – AREVALO 00001-AREVALO 00004;**
3. **EXHIBIT C – Character Reference Letter from Alex Cabriales dated October 16, 2023 AREVALO 00005-AREVALO 00007;**

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- 4. **EXHIBIT D** – Character Reference Letter from Vanessa Camargo dated October 16, 2023 – **AREVALO 00008-AREVALO 00010**;
- 5. **EXHIBIT E** – I.S.A.E. Certification of Parenting After Divorce & Separation Level 1, Completed by Mr. Arevalo - **AREVALO 00011-AREVALO 00012**;
- 6. **EXHIBIT F** – Character Reference Letter from Lynea Garcia (undated) – **AREVALO 00013-AREVALO 00014**;
- 7. **EXHIBIT G** – Character Reference Letter from Michael W. Goss, DDS dated October 16, 2023 – **AREVALO 00015-AREVALO 00016**;
- 8. **EXHIBIT H** – Letter from Alyssa Vossler, Senior Probation Officer, Twenty-Third Judicial District, State of Colorado, dated February 6, 2025, confirming Respondent's successful completion of domestic violence treatment and compliance with probation terms - **AREVALO 00017-AREVALO 00018**;
- 9. **EXHIBIT I** – Character Reference Email from Alyssa Shaw - **AREVALO 00019-AREVALO 00020**;
- 10. **EXHIBIT J** – Forensic Psychological Examination of Mr. Arevalo by Mark J. Chambers, Ph.D – **AREVALO 00022-AREVALO 00026**.

Respondent reserves the right to supplement this list with additional witnesses and exhibits as may be required in defense of this matter.

Dated this 6th day of February, 2025.

Respectfully submitted,  
**SPARTACUS LAW FIRM**  
  
/s/ Chandon S. Alexander

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**CERTIFICATE OF SERVICE**

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Pursuant to Nev. R. Civ. P. 5(b), I hereby certify that on the 6th day of February, 2025 I caused the preceding document entitled **RESPONDENT’S PREHEARING STATEMENT** to be served on the following parties via the U.S. Postal Service:

REAL ESTATE DIVISION  
STATE OF NEVADA  
3300 W. Sahara Avenue, Suite 350  
Las Vegas, Nevada 89102  
ATTN: Sharath Chandra

Aaron D. Ford  
Christal P. Keegan  
5420 Kietzke Lane, Suite 202  
Reno, Nevada 89511  
Attorney for Real Estate Division

/s/ Chandon S. Alexander  
An Employee of SPARTACUS LAW FIRM