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Commission on Judicial Discipline

**BEFORE THE NEVADA COMMISSION ON JUDICIAL DISCIPLINE**

IN THE MATTER OF THE HONORABLE  
WILLIAM S. POTTER, Eighth Judicial District  
Court, Department M - Family Court,  
County of Clark, State of Nevada

CASE NO. 2019-182-P

Respondent.

**FORMAL STATEMENT OF CHARGES**

COMES NOW Thomas C. Bradley, Prosecuting Officer for the Nevada Commission on Judicial Discipline ("Commission" or "NCJD"), established under Article 6, Section 21 of the Nevada Constitution, who, in the name of and by the authority of the Commission, as found in NRS 1.425 - 1.4695, files this Formal Statement of Charges and informs the Respondent, the Honorable William S. Potter, Eighth Judicial District Court, County of Clark, State of Nevada ("Respondent"), that the following acts were committed by Respondent and warrant disciplinary action by the Commission under the Revised Nevada Code of Judicial Conduct ("the Code").

## **FACTUAL ALLEGATIONS**

Beginning on or about July 10, 2019, and continuing through approximately November 5, 2019, Respondent knowingly, and in the capacity of his office as District Court Judge, Eighth Judicial District Court, County of Clark, State of Nevada, engaged in the following acts:

On July 10, 2019, the Respondent walked into the chambers of the Honorable Linda Bell, then Chief Judge of the Eighth Judicial District Court. Judge Bell was not in her chambers at that time. The Respondent left a patch and note on Judge Bell's desk. The patch depicts a man with short dark hair and blue eyes with a ball gag in his mouth. The patch says: "Gag Order, Esquire." The note next to the patch stated: "Thinking of you, Billy." The man depicted in the patch resembles Respondent. Respondent also gave one of the "Gag Order, Esquire" patches to each of Judge Bell's female co-workers, namely JEA Sylvia Perry, Court Recorder Renee Vincent, and Court Clerk Kimberly Estala. Additionally, Respondent gave another "Gag Order, Esquire" patch to Yasnai Rodriguez who was then a law clerk to Judge Linda Marquis. The depiction on the patch is commonly associated with sexual bondage, domination, fetish and fantasy. Gags also have connotations of punishment, control, humiliation, and helplessness. The female co-workers found the patch to be sexual in nature and inappropriate in the workplace. Judge Bell found the patch and the attached note to be highly inappropriate and offensive. Accordingly, Judge Bell filed a complaint against the Respondent based upon this wrongful conduct.

On or about November 5, 2019, the Eighth Judicial District Court held a meeting regarding guardianship compliance where a number of judges and Court personnel were present. Before Judge Bell arrived at the meeting, Respondent stated to those present at the meeting that Judge Bell had "erotic" or "risqué" coloring books in her chambers. This statement was totally false and was also offensive to Judge Bell.

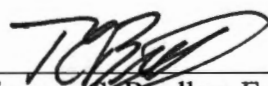
## **COUNT ONE**

By engaging in the acts, or combination of the acts, listed above, and giving Judge Bell and other female court personnel "Gag Order, Esquire" patches which are highly inappropriate and

offensive, Respondent knowingly or unknowingly, violated the Code, including Judicial Canon 1, Rule 1.1 (failing to comply with the law, including the Code); Rule 1.2 (failing to act at all times in a manner that promotes public confidence in the independence, integrity, and impartiality of the judiciary and avoiding impropriety and the appearance of impropriety); Canon 2, Rule 2.3 (refraining from bias, prejudice, and harassment); and Rule 2.8 (failing to maintain decorum and demeanor).

Based on the information above, the Commission shall hold a public hearing on the merits of these facts and Count One pursuant to NRS 1.4673 and, if the violations as alleged are found to be true, the Commission shall impose whatever sanctions and/or discipline it deems appropriate pursuant to NRS 1.4677 and other Nevada Revised Statutes governing the Commission.

Dated this 20 day of August, 2020.

Submitted by:   
Thomas C. Bradley, Esq., SBN 1621  
Prosecuting Officer for the NCJD

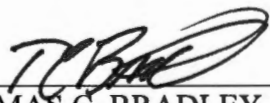
STATE OF NEVADA )  
 ) ss  
COUNTY OF WASHOE )

THOMAS C. BRADLEY, ESQ. being first duly sworn under oath, according to Nevada law, and under penalty of perjury, hereby states:

1. I am an attorney licensed to practice law in the State of Nevada. I have been retained by the Nevada Commission on Judicial Discipline to serve in the capacity of Prosecuting Officer in the matter of the Honorable William S. Potter, Case No. 2019-182-P.

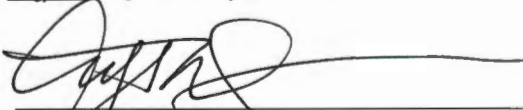
2. I have prepared and reviewed this Formal Statement of Charges against the Honorable William S. Potter and, pursuant to the investigation conducted in this matter, and based on the contents of that investigation and following reasonable inquiry, I am informed and believe that the contents of this Formal Statement of Charges are true and accurate.

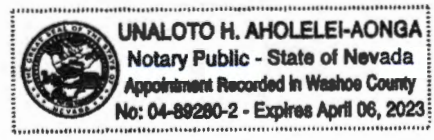
Dated this 20 day of August, 2020.

  
\_\_\_\_\_  
THOMAS C. BRADLEY, ESQ.

Subscribed and sworn to before me, a Notary Public

this 20<sup>th</sup> day of August, 2020.


By:   
\_\_\_\_\_  
NOTARY PUBLIC



**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this FORMAL STATEMENT OF CHARGES was placed in the U.S. mail, postage pre-paid, on this 20 day of August, 2020, addressed to:

The Hon. William S. Potter  
Eighth Judicial District Court  
Department M  
200 Lewis Avenue  
Las Vegas, NV 89155

By:   
Thomas C. Bradley, Esq.  
Prosecuting Officer for NCJD